

Snyder  
Terry L. Snyder, Volume 2

v.  
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B-0302



**In the Matter Of:**

**Snyder  
v.  
CitiSteel, USA, Inc.**

**C.A. # 04-970 (JJF)**

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**Transcript of:**

**Terry L. Snyder  
Volume # 3  
October 16, 2006**

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October 16, 2006

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,	)	
	)	
Plaintiff,	)	Volume 3
	)	Civil Action
v.	)	No. 04-970 (JJF)
	)	
CITISTEEL USA, INC.,	)	
	)	
Defendant.	)	

Continued deposition of TERRY L. SNYDER taken pursuant to notice at the law offices of Young Conaway Stargatt & Taylor LLP, The Brandywine Building, 1000 West Street, 17th Floor, Wilmington, Delaware, beginning at 10:15 a.m. on Monday, October 16, 2006, before Lucinda M. Reeder, RDR, CRR and Notary Public.

APPEARANCES:

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MARGARET DiBIANCA, ESQ.

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for the Defendant.

ALSO PRESENT:

DEBBIE COLES, YOUNG, CONAWAY, STARGATT & TAYLOR LLP

JEFF CASTELLANO, YOUNG, CONAWAY, STARGATT & TAYLOR LLP

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1 TERRY L. SNYDER,  
2 the witness herein, having first been  
3 duly sworn on oath, was examined and  
4 testified as follows:  
5 BY MS. DiBIANCA:  
6 Q. Good morning.  
7 A. **Good morning.**  
8 Q. Hi.  
9 A. **How you doing?**  
10 Q. Very well. How about you?  
11 A. **Good.**  
12 Q. We're back today for the continuation of your  
13 deposition, which we ended last on June 6th, I believe  
14 is the date, and we're here today just for damages  
15 information that came out of the tax returns.  
16 A. **Okay.**  
17 Q. The first thing I'm going to give you we're  
18 going to mark as an exhibit.  
19 (Snyder Deposition Exhibit No. 17 was  
20 marked for identification.)  
21 BY MS. DiBIANCA:  
22 Q. This, I am not sure you have been seen this  
23 before, this is I'll represent to you is a letter from  
24 your counsel, dated back in March of this year

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1 spelling out your damages. This is primarily what  
2 we're going to be discussing today.  
3 Did you have any input into the calculation  
4 of these damages?  
5 A. **I don't understand.**  
6 Q. Let's see. The first, the second sentence  
7 states that: "Our computation of damages is follows:  
8 \$68,487 in back pay and \$45,658 for future losses,  
9 \$100,000 for pain and suffering, 4100,000 in punitive  
10 damages and \$4,000 for out-of-pocket medical  
11 expenses." Did you help come up with those figures?  
12 A. **I don't recall.**  
13 Q. Okay. 45,000, approximately, dollars for  
14 future losses. That's the second number there.  
15 A. **Okay.**  
16 Q. Can you tell me what that represents?  
17 A. **No. I can't remember.**  
18 Q. \$100,000 for pain and suffering, can you tell  
19 me what that represents?  
20 A. **Yeah, the torture they put me through. Mm-hmm.**  
21 Q. Okay. Anything sort of more specific than  
22 that, sort of --  
23 A. **Being tormented and harassed and fondled and**  
24 **then being pushed off the grounds, yeah.**

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1 Q. Okay.  
2 A. **Mm-hmm.**  
3 Q. And then the \$4,000 for out-of-pocket medical  
4 expenses, who were those costs paid to?  
5 A. **Well, I would assume the doctors and the**  
6 **therapists.**  
7 Q. Okay.  
8 A. **Mm-hmm.**  
9 Q. So that would be which doctors and therapists?  
10 A. **Cindy Wright, Goodman.**  
11 Q. Those are the costs you incurred with them?  
12 A. **I'm assuming. Whatever I provided.**  
13 Q. Say again.  
14 A. **Whatever it came to, yeah, so.**  
15 Q. I am just going to give you some copies of tax  
16 returns. Let's start with 2000. Actually maybe I  
17 should move all of these in at once. It might be  
18 easier. Let's do that. I am going to hand you Snyder  
19 18, and that will be the 2,000 tax returns.  
20 (Snyder Deposition Exhibit No. 18 was  
21 marked for identification.)  
22 BY MS. DiBIANCA:  
23 Q. Have you seen these recently?  
24 A. **No. Recently, no.**

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1 Q. Okay. Do you want a minute to go over them?  
2 A. **No.**  
3 Q. Okay.  
4 A. **Tell me what you want me to look at. I'll look**  
5 **at it.**  
6 Q. Let's get to the W-2s. The W-2s. Just flip  
7 through; there should be W-2s.  
8 A. **Okay.**  
9 Q. If you want to go through and tell me the  
10 places where you worked according to that.  
11 A. **Bank One.**  
12 Q. Where was Bank One?  
13 A. **202, Concord Pike.**  
14 Q. Okay.  
15 A. **The Brandywine Building.**  
16 Q. Okay. And how long did you work there for?  
17 A. **Four months.**  
18 Q. Did you work there for -- through a temporary  
19 agency, or --  
20 A. **No.**  
21 Q. Applied directly?  
22 A. **Yes.**  
23 Q. And then the next one? They're double-sided  
24 printed, so there is one on the back there.

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1 **A. Mm-hmm.**  
2 Q. What was that one?  
3 **A. Associates.**  
4 Q. What was that?  
5 **A. A bank.**  
6 Q. A bank?  
7 **A. Mm-hmm.**  
8 Q. Where was it?  
9 **A. Newark.**  
10 Q. Did you apply directly there or through a --  
11 **A. Yes.**  
12 Q. You did?  
13 **A. Mm-hmm.**  
14 Q. How long did you work there for?  
15 **A. Four months.**  
16 Q. Why did you leave?  
17 **A. I was terminated, actually. They let me no.**  
18 Q. For what?  
19 **A. I got in an argument with a girl.**  
20 Q. Okay. Then the next one.  
21 **A. TCIM Service.**  
22 Q. Do you know what that is?  
23 **A. I think it's a phone ... it was on the phones**  
24 **or something.**

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1 Q. Like a telemarketing?  
2 **A. Something, yeah. Yeah.**  
3 Q. How long was that for?  
4 **A. That wasn't long.**  
5 Q. Like less than six months, do you think?  
6 **A. Definitely.**  
7 Q. Okay.  
8 **A. Yeah.**  
9 Q. And what happened there?  
10 **A. I really don't recall that at all. Yeah.**  
11 Q. And then the next one?  
12 **A. Is that all of them?**  
13 Q. It might be.  
14 **A. Do you want me to keep flipping till I find a**  
15 **W- --**  
16 Q. I think that might be --  
17 **A. 2?**  
18 Q. I think that's all of them.  
19 **A. Okay.**  
20 Q. Then we'll do this one as the next version.  
21 **A. Do you want these back?**  
22 Q. No. But let me give you a stapler, actually.  
23 (Snyder Deposition Exhibit No. 19 was  
24 marked for identification.)

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1 BY MS. DiBIANCA:  
2 Q. These are the same thing, but for the year 2001  
3 so we're going to do exactly the same thing again.  
4 **A. Okay.**  
5 Q. If you want to go to the first W-2.  
6 **A. Okay.**  
7 Q. And what is that?  
8 **A. Delaware Temp Systems, but it's actually**  
9 **Bernard. They go by two names.**  
10 Q. Do they go by any other names that you know of?  
11 **A. No.**  
12 Q. Okay. Where are they located?  
13 **A. Well, there's two locations, one on 4th &**  
14 **Greenhill, and the other one is right off Woodmill.**  
15 **It looks like a bunch of houses, but they're offices.**  
16 **Woodmill something. Like a little office circular**  
17 **thing, and it's off Kirkwood Highway.**  
18 Q. And how long did you work with them?  
19 **A. Well, I have been registered with them since**  
20 **2001, actually.**  
21 Q. So this was the first year you started working  
22 with them, was 2001?  
23 **A. This was the first year?**  
24 Q. This meaning 2001.

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1 **A. Yes.**  
2 Q. Okay.  
3 **A. Working for them, yeah.**  
4 Q. How many jobs did you get with them?  
5 **A. I can't recall.**  
6 Q. How about -- do you remember how often you got  
7 jobs through them?  
8 **A. Whenever they called, if they said go, I'd go.**  
9 Q. Okay. Do you think it was maybe -- do you  
10 think -- would you say you were regularly employed  
11 through them?  
12 **A. I think there was too many gaps.**  
13 Q. Okay.  
14 **A. I didn't have -- I didn't get as many**  
15 **assignments as I would like to. You know, for every**  
16 **job that one person applies 500 more applicants are**  
17 **applying. I just applied with DART, and they told me**  
18 **thousands applied, so, you know. But I got called to**  
19 **take the test. Anyway, that's irrelevant. Sorry.**  
20 Q. Okay. And then you continued to work with  
21 Bernard or Temporary Systems for how long? When was  
22 the last time you worked with them or did a job  
23 through them?  
24 **A. Last year, I am going to say.**

3 (Pages 242 to 245)

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1 Q. Then who is the next one on there?  
2 **A. Priority One Staffing.**  
3 Q. Who is that?  
4 **A. I don't recall at all.**  
5 Q. Okay. Who is the next one on there?  
6 **A. I can see why. I guess I didn't do much for**  
7 **them. This is supposed to say, "Pyramid, I think. It**  
8 **says "Myriad."**  
9 Q. Okay. What's Pyramid?  
10 **A. It's a staffing agency for C and Es and**  
11 **flaggers, flagging for construction companies. Flag**  
12 **persons. Sorry.**  
13 Q. Did they place you in jobs?  
14 **A. Yes.**  
15 Q. Do you recall how many?  
16 **A. No. Various. I even worked for them while I**  
17 **was working at CitiSteel. I would work at night**  
18 **sometimes a couple hours and on the weekends.**  
19 Q. Okay.  
20 **A. Whenever she called.**  
21 Q. Is it usually the same or I guess it would be a  
22 flagging company or is it the government? Depends?  
23 on --  
24 **A. No government. It's a temp agency, but they**

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1 **only -- they give assignments to C and Es.**  
2 Q. Okay.  
3 **A. And flag persons.**  
4 Q. Okay.  
5 **A. Two completely different occupations she ran.**  
6 Q. Okay.  
7 **A. Mm-hmm.**  
8 Q. Who are the companies that were hiring through  
9 Pyramid?  
10 **A. You mean who she contract for?**  
11 Q. Right.  
12 **A. I can't recall. Various construction. And I**  
13 **was with her for a few years.**  
14 Q. Do you remember the last time you went through  
15 her?  
16 **A. During, I think CitiSteel days. So I am going**  
17 **to say, maybe the beginning of 2003 or the end of**  
18 **2002. I really can't honestly answer that. I don't**  
19 **recall, period.**  
20 Q. But you don't think you've worked for them  
21 since you left CitiSteel?  
22 **A. I said, "I don't recall."**  
23 Q. Okay. I thought you said ... Okay. Then is  
24 there another one after that?

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1 **A. CitiSteel.**  
2 Q. Okay. Is there another one?  
3 **A. No questions for CitiSteel, huh?**  
4 Q. We already know you worked there.  
5 **A. Uh-huh. Associates National Bank again.**  
6 Q. Do you think that's the same as the other one  
7 that said just "Associates"?  
8 **A. Yeah.**  
9 Q. Okay.  
10 **A. Keeping going?**  
11 Q. Yes, please. Oh, no, you are fine at that  
12 point. That would be all the W-2s.  
13 The first part is the one we got from the  
14 IRS. The second one is the same thing from Jackson  
15 Hewitt. So it's a duplicate.  
16 **A. Okay.**  
17 Q. Okay. We'll do 2002.  
18 (Snyder Deposition Exhibit No. 20 was  
19 marked for identification.)  
20 BY MS. DiBIANCA:  
21 Q. I am just going to do the exact same thing.  
22 **A. Okay. Do you want me to flip?**  
23 Q. Yes.  
24 **A. CitiSteel.**

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1 Q. Okay. So that there is no Pyramid W-2 there.  
2 So do you think that that is correct or do you think  
3 that is incorrect?  
4 **A. I -- that question sounds so twisted.**  
5 Q. Let me rephrase it then. The only W-2 attached  
6 to the 2002 tax return is for CitiSteel.  
7 **A. Okay.**  
8 Q. My understanding is that you thought you had  
9 worked at Pyramid --  
10 **A. Okay.**  
11 Q. -- sometime on and off during --  
12 **A. Yes. Okay.**  
13 Q. -- the CitiSteel employment? But probably not  
14 in 2002; do you think that might be accurate?  
15 **A. Guess not.**  
16 Q. Okay.  
17 **A. It says not, it's not.**  
18 MS. DiBIANCA: I am going to do '03.  
19 (Snyder Deposition Exhibit No. 21 was  
20 marked for identification.)  
21 BY MS. DiBIANCA:  
22 Q. And what's the W-2 there?  
23 **A. CitiSteel.**  
24 Q. Anything else?

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4 (Pages 246 to 249)



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1 **A. Fidelity Investments.**  
2 Q. Might that have been like a 401(k), maybe?  
3 **A. Oh, yeah.**  
4 Q. Or pension, probably?  
5 **A. Yeah.**  
6 Q. So you think that's right?  
7 **A. Yes.**  
8 Q. Then no other?  
9 **A. Yes. If that's what the government says, you**  
10 **can't get any clearer than that.**  
11 MS. DIBIANCA: This is 2004.  
12 (Snyder Deposition Exhibit No. 22 was  
13 marked for identification.)  
14 THE WITNESS: Is this a W-2 from  
15 Pennsylvania? It doesn't say "W-2."  
16 MS. DIBIANCA: I'm not sure what it is.  
17 But if it doesn't say "W-2," we can probably skip it.  
18 BY MS. DIBIANCA:  
19 Q. Did you work in Pennsylvania in 2004?  
20 **A. I have done assignments in Pennsylvania, so I**  
21 **don't know. Some of the agencies I registered with**  
22 **was out of Pennsylvania.**  
23 Q. So that is probably why, then.  
24 **A. I mean, it says I did, so. You have to tell me**

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1 **here, so.**  
2 Q. I would just flip until you get to a W-2.  
3 Okay?  
4 **A. Do you want me to start talking on my own? The**  
5 **Franklin Company.**  
6 Q. What was that?  
7 **A. A temp agency.**  
8 Q. Where are they?  
9 **A. Broomall, Pennsylvania.**  
10 Q. How long did you work for them?  
11 **A. I think I did only one assignment for them at**  
12 **Hercules.**  
13 Q. How long was that? How long did the project  
14 last?  
15 **A. It was just a few weeks, I think.**  
16 Q. What happened when you left there?  
17 **A. What do you mean? I don't understand.**  
18 Q. How did your end of employment come to be?  
19 **A. I stopped. I ended up working in Verizon,**  
20 **Pennsylvania. Wait a minute. Was it Pennsylvania?**  
21 **Yeah, I guess. Yeah.**  
22 Q. So you resigned?  
23 **A. Yeah. I left the assignment a little early.**  
24 Q. Was that a problem for them?

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1 **A. Well, they didn't say they hated me. They**  
2 **thanked me for my time.**  
3 Q. Okay.  
4 **A. And thanked me for letting them know in**  
5 **advance.**  
6 Q. How long was the project supposed to last?  
7 **A. I only left like a week early, so.**  
8 Q. And then you said Verizon?  
9 **A. Yes.**  
10 Q. Where was that?  
11 **A. Philly.**  
12 Q. This was 2004. Do you know what part of 2004  
13 it would have been?  
14 **A. Well, whatever this -- whenever I was here at**  
15 **Hercules, right after. I mean, I started there. I**  
16 **went from here to there. So whenever this was,**  
17 **somewhere maybe August or September, something, I**  
18 **guess.**  
19 Q. What were you doing at Verizon?  
20 **A. I started to do calls.**  
21 Q. And then when did you leave there? How long  
22 did that last?  
23 **A. Maybe a month.**  
24 Q. Why did you leave?

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1 **A. A little more. I missed the train. You**  
2 **weren't allowed to miss any time in the period, in the**  
3 **training period, or something.**  
4 Q. Like a probationary period you mean?  
5 **A. Something -- well, yeah.**  
6 Q. Or introductory period, maybe?  
7 **A. Something like that, yes.**  
8 Q. So it was a termination because of absenteeism?  
9 **A. Well, I don't think it was that. Here it is**  
10 **right here. I don't know. I missed the train and --**  
11 **so. That's all I know.**  
12 Q. Which one are you pointing out there?  
13 **A. Well, I just noticed that it said "Verizon." I**  
14 **didn't -- I thought half of it was missing because I**  
15 **had it turned this way.**  
16 Q. So the next W-2 is Verizon?  
17 **A. Yes, ma'am. Upper Darby.**  
18 Q. Then did you call -- did you call in after you  
19 were late or did you return to work or did they call  
20 you?  
21 **A. Yeah. Well, I missed the train and I got there**  
22 **late, and I missed it again, I think, or something.**  
23 **Yeah.**  
24 Q. So did they tell you that --

5 (Pages 250 to 253)

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1 **A. Yes, yes, they did.**  
2 Q. Okay. Then what's the next one?  
3 **A. Okay. This is Bernard again. Instead of it**  
4 **saying, "Delaware Temporary Staffing," it just --**  
5 **"Delaware" is missing. They go by Bernard and**  
6 **Delaware Temporary Services or Staffing. Here it just**  
7 **says, "Temporary Staffing."**  
8 Q. So it says, "Temporary Staffing" on there?  
9 **A. Yeah. Woodmill. Yeah, okay, because that's**  
10 **their address, yeah, Woodmill Drive.**  
11 Q. How many projects did you get through them this  
12 year?  
13 **A. I don't recall.**  
14 Q. Okay. Do you remember any of the places where  
15 they sent you?  
16 **A. They sent me all over. One time I was on Broad**  
17 **Street working for some architect.**  
18 Q. That would have been in Philadelphia?  
19 **A. Broad Street is, yes.**  
20 Q. Broad Street. Mm-hmm.  
21 **A. No, I don't recall. They sent me all over. If**  
22 **you contact them, I am sure maybe they have a list or**  
23 **something like that. You got all this other**  
24 **information. I am sure you can find it.**

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1 Q. How long were the projects generally?  
2 **A. One could be a week. One could be months.**  
3 Q. Months?  
4 **A. It varied. Varied. There is the answer,**  
5 **varied.**  
6 Q. How long would you say the longest one was?  
7 **A. CitiSteel. I ended up becoming a permanent**  
8 **employee through them.**  
9 Q. Any other ones that you didn't become a  
10 permanent employee at?  
11 **A. That I did?**  
12 Q. That you did not become a permanent employee?  
13 **A. All of them. I did not. I just did**  
14 **assignments.**  
15 Q. Right. How long was the longest of those?  
16 **A. I don't recall, period.**  
17 Q. Would you say any of them lasted for more than  
18 a month?  
19 **A. I already answered that. I don't recall,**  
20 **period.**  
21 Q. Okay.  
22 **A. Uh-huh.**  
23 Q. Any other W-2s in that one?  
24 **A. CitiSteel, again. Oh. Fidelity Investments,**

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1 **again.**  
2 Q. If you want to flip back. I think it's  
3 probably the second page or the third page, maybe,  
4 where it's the actual return.  
5 **A. This or this?**  
6 Q. That first page.  
7 **A. This?**  
8 Q. I'm sorry. The first page of the return. Yes,  
9 that one.  
10 **A. This?**  
11 Q. Yeah. The dependents there, could you tell me  
12 who they are, please?  
13 **A. My mother, Clara Snyder, and Samantha and**  
14 **Ashley King.**  
15 Q. Who are they?  
16 **A. Clara Snyder is my mother, and Ashley and**  
17 **Samantha are my little cousins.**  
18 Q. Okay. And --  
19 **A. It says, "niece" and "nephew." They're**  
20 **females. Neither one of them is my niece or nephew.**  
21 **I don't have any brothers or sisters to have nieces or**  
22 **nephews, but. It's a typo.**  
23 Q. It should say "cousins"?  
24 **A. Yes.**

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1 Q. Okay.  
2 **A. Mm-hmm.**  
3 Q. Why were they your dependents this year, in  
4 2004?  
5 **A. Well, their mother was homeless.**  
6 Q. Okay.  
7 **A. And they were homeless and the mom had to stay**  
8 **at her mom's, and there was too many people there, and**  
9 **so I let them stay with me.**  
10 Q. Okay.  
11 **A. And she told me to claim them, so I did. She**  
12 **would come down, too, during the day. Basically, she**  
13 **would just sleep at her mother's, the mother of them.**  
14 Q. Okay. All right. We're done with that one.  
15 I am just going to do 2005.  
16 (Snyder Deposition Exhibit No. 23 was  
17 marked for identification.)  
18 BY MS. DiBIANCA:  
19 Q. Okay. What do we have on this one?  
20 **A. Bayshore Ford Truck Sales.**  
21 Q. When did you work there?  
22 **A. I don't know. Well, it says, "2005," so 2005.**  
23 Q. How long did you work there?  
24 **A. Not long. Maybe a week. Something like that.**

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6 (Pages 254 to 257)

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1 Q. What happened when you left there?  
2 **A. I wasn't -- why did I leave?**  
3 Q. Mm-hmm.  
4 **A. I wasn't -- they said that I wasn't doing it**  
5 **quick enough. Some girl had to train me. So they let**  
6 **me go.**  
7 Q. Okay.  
8 **A. Mm-hmm. Who can learn all this in -- it wasn't**  
9 **even a week. How can -- you know, I think there**  
10 **should be a training period. A good time frame, so.**  
11 Q. Would you call that a voluntary resignation or  
12 a termination?  
13 **A. I don't know. Call it whatever you want. I**  
14 **don't know.**  
15 Q. Did you quit or were you fired?  
16 **A. They let me go. I already told you that just a**  
17 **moment ago.**  
18 Q. Okay, okay. Where else?  
19 **A. I'm sorry?**  
20 Q. What's the next one?  
21 **A. Keep going? Vintage Properties.**  
22 Q. Tell me about that.  
23 **A. It's a company that owns apartment complexes,**  
24 **and I would rent apartments, a leasing agent.**

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1 **Basically, it was on the weekends and sometimes it**  
2 **would be one day on a weekend. It wasn't enough time.**  
3 **I wanted to work full-time, you know, and it wasn't.**  
4 Q. How did you find that job? Was that through a  
5 placement service?  
6 **A. No. In the News Journal, under "leasing**  
7 **consultants," you know, when they have the ads.**  
8 Q. So you applied to them direct?  
9 **A. Yes.**  
10 Q. How long did that last?  
11 **A. I don't recall.**  
12 Q. But it was weekends only?  
13 **A. I may have worked during the week or they may**  
14 **have called me once or twice during the week. I**  
15 **really don't recall. If they called me, I would go**  
16 **in, period, so.**  
17 Q. Then was there another one after that or is  
18 that the last one?  
19 **A. Well, it says, "Delaware Temp Services."**  
20 **That's Bernard.**  
21 Q. This would have been for 2005. Do you remember  
22 how many places you got placed with Bernard --  
23 **A. No.**  
24 Q. -- in 2005?

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1 **A. No, I don't remember.**  
2 Q. Okay. And Vintage Properties, where did you  
3 go -- I know that in the taxes one comes after  
4 another, but. What was the sequence of time? Which  
5 came first, Vintage Properties, Bayshore?  
6 **A. I don't know.**  
7 Q. You don't remember?  
8 **A. No, I don't.**  
9 Q. Do you remember if you worked any place after  
10 Vintage Properties?  
11 **A. No. I don't remember.**  
12 Q. Okay.  
13 **A. One came after another, so.**  
14 Q. Do you recall if you had other -- not a  
15 specific place, but other employment when you left  
16 Vintage Properties?  
17 **A. I don't recall. Whatever this stuff says.**  
18 Q. That doesn't indicate any time frames.  
19 **A. We can call them and ask them. I don't recall.**  
20 Q. Oh, no. I mean for -- when you left there, did  
21 you go from there to another job?  
22 **A. I said, I don't recall.**  
23 Q. Okay.  
24 **A. Okay.**

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1 Q. Okay. So we're done with taxes. Let's talk  
2 about job search. This is -- we're only going to talk  
3 about after CitiSteel, so April 2003 to the current.  
4 **A. Mm-hmm.**  
5 Q. When you left CitiSteel, do you recall when the  
6 first time was that you looked for work?  
7 **A. No, I don't recall.**  
8 Q. Okay. Do you recall what you did to look for  
9 work?  
10 **A. Go on the Internet, faxes, calls, go around**  
11 **places and apply.**  
12 Q. You produced a lot of faxes to various  
13 employers, and I believe they were from the Department  
14 of Labor, sent from the Department of Labor?  
15 **A. Yeah. I still even go there and use their**  
16 **equipment. When you are looking for a job, you are**  
17 **welcome to go there, use their computers and their fax**  
18 **machines and stuff. I think I supplied all this**  
19 **information to you before. I think you have asked me**  
20 **these questions before.**  
21 Q. You did supply all the faxes?  
22 **A. Yeah. But I think you have even asked me all**  
23 **these exact same questions before in our previous**  
24 **deposition and now you are asking again, so.**

7 (Pages 258 to 261)

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1 Q. For the job search part?  
2 **A. Yeah, yeah. Yeah, you did.**  
3 Q. Okay. So --  
4 **A. So you should have all that on record, my**  
5 **answers.**  
6 Q. At the time I believe you didn't recall.  
7 **A. I don't think you recall asking me these**  
8 **questions.**  
9 Q. But if you do your search throughout your  
10 documents that you have, you'll find that you have  
11 asked me these questions before.  
12 **A. Okay.**  
13 Q. But today, the reason we're here today is for  
14 damages testimony.  
15 **A. Okay. To repeat ourselves, repeat the same**  
16 **questions?**  
17 Q. No. Today, we're here for damages testimony to  
18 give you the opportunity to put on the record what  
19 damages you have.  
20 MS. BREWINGTON: Okay. If I could just  
21 interrupt. I think what Terry is saying, you did ask  
22 her specifically about the faxes.  
23 THE WITNESS: And job searches.  
24 MS. BREWINGTON: I don't know if she went

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1 through taxes, I don't recall that, but I know you did  
2 ask her about that. But I just --  
3 MS. DiBIANCA: Because at that time,  
4 remember, you had actually produced the job search  
5 faxes as a supplement. So that was actually produced  
6 after the deposition.  
7 MS. BREWINGTON: But I do remember you  
8 asked her about --  
9 THE WITNESS: But you did ask me about when  
10 I first did my job search before in one of the  
11 previous depositions, and it's documented somewhere.  
12 It's on the transcriptions and all that. You have  
13 asked me that before already.  
14 MS. BREWINGTON: How about we try to  
15 continue to go forward without trying to repeat what  
16 we did before.  
17 THE WITNESS: Yes. Exactly.  
18 BY MS. DiBIANCA:  
19 Q. Where was the last place that you worked?  
20 **A. Driving a tractor -- just recently?**  
21 Q. Yes.  
22 **A. Driving a tractor-trailer.**  
23 Q. Where was that?  
24 **A. The name of the company or the address? D and**

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1 **E or DE. Delaware -- DVE, Delaware Valley Express,**  
2 **Hay Road, Wilmington, Delaware. But I didn't drive in**  
3 **Delaware. Well, I would leave out of Delaware.**  
4 Q. It's on Hay Road?  
5 **A. Hay Road.**  
6 Q. H-A-Y?  
7 **A. Yes, ma'am.**  
8 Q. When did you work there?  
9 **A. June -- not even a week after Skelly. The very**  
10 **beginning of June. Maybe June 10th.**  
11 Q. You still --  
12 **A. Wait a minute, wait a minute.**  
13 Q. Sorry.  
14 **A. 2nd, 3rd -- not even a week after Skelly. The**  
15 **very beginning of June 2006.**  
16 Q. Are you still working there now?  
17 **A. No.**  
18 Q. When did you leave there?  
19 **A. Soon after. Every day I called in, they didn't**  
20 **have any runs for me. One day they called, my mother**  
21 **and I was in a doctor's office, and demanding, you**  
22 **know, get here now and go on a run. I said, "That is**  
23 **impossible." I wasn't going to walk out of the**  
24 **doctor's office. I had an appointment there, too, or**

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1 **leave my mother, so I just never contacted them again.**  
2 Q. How did you get -- what was your rate of pay?  
3 Was it pay per run?  
4 **A. It was supposed to be \$18 an hour.**  
5 Q. Okay.  
6 **A. He paid me for the run \$135, which I think one**  
7 **of the truckers told me it was lower than what I was**  
8 **supposed to get for it.**  
9 Q. Do you still have the pay stubs for that  
10 employment?  
11 **A. I should, yes. Well, no. He paid me in cash,**  
12 **and there was just a receipt. There was no pay stub.**  
13 **He didn't give me a pay stub.**  
14 Q. So I'll just put on the record an official  
15 document request: If there is anything relating to  
16 your wages or earnings at Delaware Valley Express for  
17 the 2006 year, that they be produced.  
18 **A. I think I have the receipt. If not, maybe they**  
19 **have a copy.**  
20 Q. Are they still in business?  
21 **A. I couldn't tell you.**  
22 Q. But they were when you left?  
23 **A. Yeah.**  
24 Q. Okay. Who was your supervisor there or your

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8 (Pages 262 to 265)

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1 contact person?  
2 **A. The owner's name is Charlie. His brother's**  
3 **name was Walter. Walter was the one I continued to**  
4 **call every day for a run.**  
5 Q. So you would call into him?  
6 **A. Yes.**  
7 Q. Okay. What's the last name?  
8 **A. Oh. I don't know. I don't recall.**  
9 Q. Did you apply directly there?  
10 **A. Yes.**  
11 Q. And Skelly, what -- you said June was the last  
12 date there?  
13 **A. Yes. Sorry. I'm sorry. My head is killing**  
14 **me. I'm sorry.**  
15 Q. What happened for you to leave Skelly?  
16 **A. Well, I had a deposition with you that week,**  
17 **and when I went in the next day, I think we had some**  
18 **other dates set up or something, and when I went in**  
19 **and told them, try to let them know in advance, he**  
20 **wasn't happy. He smacked his leg and sighed, "huh."**  
21 **And, I don't know, the next day my badge didn't work.**  
22 **He came out and said he was letting me go. That was**  
23 **it.**  
24 Q. Who is "he"?

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1 **A. His name was Lou.**  
2 Q. What's his last name?  
3 **A. I don't know. I don't recall.**  
4 Q. Do you know what the date was when you were let  
5 go?  
6 **A. June 2nd.**  
7 Q. That was the only reason was the needed time  
8 off?  
9 **A. He really didn't give me a reason. I don't**  
10 **know. I don't think he liked me, to be honest with**  
11 **you. I don't know. I kept mentioning benefits and**  
12 **asking about a benefits package. I think they were**  
13 **lying to me. They never produced nothing to me. They**  
14 **never gave me nothing.**  
15 Q. You think it might have been because they  
16 didn't want to pay benefits?  
17 **A. I don't know. I really don't know. I can't**  
18 **answer that.**  
19 Q. And then now, are you working now?  
20 **A. I wish. No.**  
21 Q. Are you seeking work now?  
22 **A. Yes.**  
23 Q. What are you doing to seek work?  
24 **A. Well, I go to unemployment. I go on the**

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1 **Internet. I send a cover letter and a resume to**  
2 **companies. I use their fax machine. I make calls. I**  
3 **just actually called a couple companies actually last**  
4 **night.**  
5 Q. What companies?  
6 **A. One is called U.S. Express. Another one is --**  
7 **I couldn't leave a message on this one -- Global**  
8 **Limousine Service. I actually did leave my name and**  
9 **number on U.S. Express even though it was a Sunday**  
10 **night. I feel if you want a job, you are going to**  
11 **look; it doesn't really matter what time of day, you**  
12 **know. If they answer, you can talk to them; if not,**  
13 **you can leave a message. It says "leave a message."**  
14 Q. There was -- you produced -- actually I guess I  
15 should just move this in. I'm sorry for the delay. I  
16 don't have it in front of me, so let me just ask.  
17 I'll represent that I believe there was a  
18 discovery response produced that said you had gotten  
19 money from your father sometime between now and the  
20 time that you had left CitiSteel. Can you tell me  
21 approximately how much?  
22 **A. He already answered them questions for you.**  
23 Q. I know, but I'm asking you.  
24 **A. 200, maybe 300 sometimes.**

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1 Q. And that was how often?  
2 **A. Maybe once every other week. Sometimes if and**  
3 **when he came to Delaware.**  
4 Q. When did that stop?  
5 **A. I don't know. He just helped me out not too**  
6 **long ago. As a matter of fact, he answered that**  
7 **question for you right soon before you seen him. When**  
8 **you met with him. So whatever that date was that you**  
9 **met with him. Maybe a week prior or a couple days**  
10 **prior to the day you met with him.**  
11 Q. Since your father's deposition, you haven't  
12 received any moneys from him; is that correct?  
13 **A. No, that's not correct.**  
14 Q. Okay.  
15 **A. No.**  
16 **What does that have to do with any of this?**  
17 **What does that have to do with this case?**  
18 MS. BREWINGTON: Terry, can you answer the  
19 question, please?  
20 THE WITNESS: I just answered it. Yes, I  
21 have received money from him since.  
22 MS. BREWINGTON: What is the question?  
23 MS. DIBIANCA: The question was: When was  
24 the last time that she got the moneys from her father?

9 (Pages 266 to 269)



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1 And I think she said he testified to that when he was  
2 here that day; that it hasn't been since then.  
3 THE WITNESS: I didn't say it hasn't been  
4 since then.  
5 MS. DiBIANCA: That's what I am just ready  
6 to clarify.  
7 THE WITNESS: No.  
8 MS. DiBIANCA: That's what I want to  
9 clarify.  
10 MS. BREWINGTON: All right. The  
11 question --  
12 THE WITNESS: Then I didn't understand that  
13 question. No. Yes, I have received moneys since you  
14 met with him. Okay.  
15 BY MS. DiBIANCA:  
16 Q. Okay. When was the last time?  
17 **A. Last Thursday.**  
18 Q. How much was that?  
19 **A. 500.**  
20 Q. And the time before that?  
21 **A. That was a couple days prior to when you met**  
22 **him, whatever his deposition was.**  
23 Q. Okay.  
24 **A. Sorry if I was confused.**

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1 Q. That's what I wanted to clarify. How much was  
2 that at that time?  
3 **A. I don't recall. It was maybe 200 or 300.**  
4 Q. Okay.  
5 **A. Mm-hmm.**  
6 Q. I am just going to move -- these are the  
7 discovery responses that you submitted since we last  
8 met. We'll do all this as one.  
9 (Snyder Deposition Exhibit No. 24 was  
10 marked for identification.)  
11 BY MS. DiBIANCA:  
12 Q. Just take a minute to look those over and see  
13 if you recall answering them. Are you done with them?  
14 Lori, do you want a minute?  
15 MS. BREWINGTON: No. I'm good.  
16 BY MS. DiBIANCA:  
17 Q. Do you remember answering those questions?  
18 **A. Not really.**  
19 Q. Do you remember being asked the questions or  
20 reviewing the questions?  
21 **A. I have been asked so many questions and given**  
22 **so many answers, I really can't remember be every**  
23 **detail with you and your associates, no. So, no.**  
24 Q. Do you remember pretty recently signing a

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1 verification form?  
2 **A. In regards?**  
3 Q. It would have been in regards to those three  
4 documents saying that those were truthful statements.  
5 MS. BREWINGTON: I have four documents. So  
6 which ones are you talking about? The three that she  
7 has?  
8 MS. DiBIANCA: It should be three I think.  
9 MS. BREWINGTON: You gave me four. Do you  
10 want me to compare mine with hers and give you back  
11 one?  
12 MS. DiBIANCA: Yes. It should be RVs,  
13 supplemental RVs, request for production, I want to  
14 say, and maybe there is a second interrogatory, too.  
15 MS. BREWINGTON: Okay. I am giving you  
16 this one back.  
17 MS. DiBIANCA: Okay. Actually I will just  
18 put this with yours, and so --  
19 MS. BREWINGTON: Okay. Since the last  
20 deposition. That way it's all current.  
21 MS. BREWINGTON: Okay.  
22 BY MS. DiBIANCA:  
23 Q. The verification would have said -- I'm sorry,  
24 you might have answered this. Did you say you did

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1 recall signing that?  
2 THE WITNESS: When I came into the office  
3 and --  
4 MS. BREWINGTON: I can't answer.  
5 THE WITNESS: Oh.  
6 MS. BREWINGTON: Just try your best to  
7 remember.  
8 THE WITNESS: Oh, sorry. I don't know. I  
9 don't know. If you tell me or show me what it was.  
10 You know what I mean? Help me out a little.  
11 MS. DiBIANCA: I don't know that I do have  
12 it here or I would. But it was a one-page  
13 verification form. A lot of papers. Nothing that I  
14 am looking for.  
15 MS. COLES: Do you want me to go get it?  
16 MS. DiBIANCA: No, I don't. If you don't  
17 mind. That way she can actually see it.  
18 MS. COLES: For which one?  
19 MS. DiBIANCA: It was for all three. It  
20 says, "Plaintiff's responses to defendant's discovery  
21 requests." It incorporated all of them. It gave the  
22 docket number, too.  
23 THE WITNESS: The package where it was a  
24 lot of questions asking me true or false, was it

10 (Pages 270 to 273)



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1 something like that?  
2 MS. DiBIANCA: That's actually in there.  
3 THE WITNESS: I remember signing that.  
4 MS. DiBIANCA: Okay.  
5 THE WITNESS: So --  
6 MS. DiBIANCA: This would have just  
7 been --  
8 THE WITNESS: I don't know what else you  
9 are talking about.  
10 MS. DiBIANCA: It's just a one-page that  
11 says -- normally, lawyers sign them, but in this case  
12 for discovery requests, the actual party has to sign,  
13 so that's why it's a separate piece of paper.  
14 THE WITNESS: What did that piece of paper  
15 say?  
16 MS. DiBIANCA: Just that you were verifying  
17 the accuracy of --  
18 THE WITNESS: My answers, of the true or  
19 false answers?  
20 MS. DiBIANCA: Yes.  
21 THE WITNESS: Okay.  
22 MS. DiBIANCA: All right. Well, she'll get  
23 that. In the meantime, we can go backwards.  
24 BY MS. DiBIANCA:

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1 Q. Now, at this time looking at those that are  
2 there, anything in there that you need to change or  
3 supplement that you see?  
4 **A. I haven't read all these. You just handed them**  
5 **to me two seconds ago, two minutes ago, so I can't**  
6 **actually answer that.**  
7 Q. Okay.  
8 **A. You know.**  
9 Q. Okay. Let's return that for now.  
10 **A. Do you mean to hand them back to you?**  
11 Q. No.  
12 **A. Flip them?**  
13 Q. I just mean move on. You can throw them back  
14 in her pile.  
15 **A. We can move right along.**  
16 Q. You were here when Cynthia Wright testified at  
17 her deposition?  
18 **A. No. I wasn't here.**  
19 Q. No?  
20 MS. BREWINGTON: No.  
21 Q. Oh, I'm sorry.  
22 **A. That's okay.**  
23 Q. I thought you were here. I'm sorry.  
24 **A. Who has a perfect memory? Ms. Molly. My God.**

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1 Q. Well, okay. You weren't here. I'm sorry.  
2 **A. Mm-hmm.**  
3 Q. When she was here, she testified about having  
4 seen you.  
5 **A. Yeah.**  
6 Q. And she went through various things that were  
7 causing you to be depressed.  
8 **A. Mm-hmm.**  
9 Q. Source of stress.  
10 **A. Like this stuff now is, just dragging it out,**  
11 **stressing me out, driving me crazy. CitiSteel and the**  
12 **associates are just continuing to drive me up the**  
13 **wall. You are correct.**  
14 Q. That was actually one of them, was her -- was  
15 the lawsuit being a source of stress; is that right?  
16 **A. Yeah. Sure. I think anybody would feel that**  
17 **way.**  
18 Q. Looking for a job, that was a source of stress;  
19 is that right?  
20 **A. Well, not having a job, I think also, you know.**  
21 Q. I have her exhibit here, so we can use that  
22 since you weren't here.  
23 **A. Okay.**  
24 Q. So you can actually see.

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1 **A. Did you want that?**  
2 Q. You produced these, so you have seen these  
3 before.  
4 **A. Okay. Sure.**  
5 Q. But this way you have something to reference.  
6 **A. Okay. Thank you. Do you want to go backwards**  
7 **or did you want to continue with Ms. Wright for now?**  
8 Q. We can do this really quick.  
9 **A. Yes. Did you want to do this first?**  
10 Q. We'll do verification first.  
11 **A. Okay.**  
12 **(Snyder Deposition Exhibit No. 25 was**  
13 **marked for identification.)**  
14 **BY MS. DiBIANCA:**  
15 Q. So this is -- do you want to tell me what it  
16 is?  
17 **A. Do you want me to read it?**  
18 Q. Do you recall signing it?  
19 **A. To tell you the truth, I have been having bad**  
20 **headaches these past couple weeks, and -- but it says**  
21 **I signed it on October 2nd, 2006, so I did. It's my**  
22 **signature, so.**  
23 Q. Okay. Do you now recall what the document is?  
24 **A. It's saying that, when I answered yes or no to**

11 (Pages 274 to 277)

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1 **another document, it's true or not. I don't know if I**  
2 **am saying it right.**  
3 Q. Do you understand that to mean that the answers  
4 that you provided were truthful?  
5 **A. To the best of my ability, yes. Yeah.**  
6 Q. Yeah. Absolutely.  
7 **A. Yeah.**  
8 Q. Okay. We're done with that.  
9 **A. Okay.**  
10 Q. That was an easy one.  
11 **A. All right.**  
12 Q. Now we're going back to Cynthia Wright. So why  
13 don't you, if you would like, why don't you tell me in  
14 your own words, what -- obviously, you know you were  
15 being treated at that time, 2000 -- after leaving  
16 CitiSteel, 2003 April and then onward from that time  
17 with Cynthia Wright.  
18 **A. What?**  
19 Q. Sorry. That was a twisted way to say it.  
20 Okay. You started seeing Cynthia Wright?  
21 **A. Why did I seek her?**  
22 Q. I was laying foundation by saying that you  
23 started seeing Cynthia Wright in April of 2003 after  
24 you left CitiSteel.

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1 **A. Correct. Okay.**  
2 Q. And you were seeing her, as she testified last  
3 time, for depression and similar emotions. Is that  
4 right?  
5 **A. Yes.**  
6 Q. And you talked -- I would like you to talk  
7 about, in your own words, instead of Ms. Wright's  
8 words, what the sources of that stress was.  
9 **A. CitiSteel.**  
10 Q. Okay. And being unemployed, was that one?  
11 **A. CitiSteel, basically. I mean, who doesn't get**  
12 **depressed for -- or bothered or something if they**  
13 **don't have a job? I mean, but, no. My objective and**  
14 **need of her was to help me, you know, overcome**  
15 **CitiSteel's torture. Bottom line, period.**  
16 Q. What about stress from the lawyers and the  
17 lawsuit?  
18 **A. Well, what about it? It's still stressful.**  
19 Q. Mm-hmm. And she helped you --  
20 **A. You're not an easy load, Molly, you know.**  
21 Q. I have heard that before.  
22 **A. You know.**  
23 Q. She was helping you with that?  
24 **A. Yes, ma'am.**

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1 Q. I believe she talked about there was, in July  
2 of 2003, stress from your relationship with your  
3 significant other. Do you recall that?  
4 **A. Aren't all men stressful? No, no, I don't**  
5 **recall, actually. They're all stressful every day,**  
6 **whether it's in a good way or bad way, so.**  
7 Q. Then, I believe, in October there was some -- a  
8 very serious family crisis.  
9 **A. I don't recall. You'd have to tell me or show**  
10 **me where it is or something.**  
11 Q. I believe it was relating to your cousin.  
12 **A. I don't -- which one?**  
13 Q. Well, let me see. I believe there was a cousin  
14 who might have attempted suicide.  
15 **A. Oh. Yeah. He jumped off the bridge, yeah.**  
16 Q. So that was, obviously, a source of stress at  
17 that time?  
18 **A. Sure. A family member, they killed themselves.**  
19 **You're not going to laugh about it, not going to be**  
20 **happy about it.**  
21 Q. Any other major life events over that period  
22 between the time you started seeing her April 2003 and  
23 we'll say, maybe the end of 2004?  
24 **A. Can you repeat that? I'm sorry.**

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1 Q. Sure. I think you saw her through February  
2 2004. But just to be on the safe side, we'll say,  
3 April 2003 until the end of 2004.  
4 **A. Well, I think my things with her expired or**  
5 **something, so whenever this ended. Yeah, I don't**  
6 **know.**  
7 Q. Okay.  
8 **A. You have to repeat that question. I'm really**  
9 **sorry.**  
10 Q. I didn't ask a question yet.  
11 **A. Okay.**  
12 Q. I think it's on the front page there what the  
13 dates were.  
14 **A. Okay. Very good.**  
15 Q. For that period of time, did you have any other  
16 major life events or sources of stress besides the  
17 ones we just talked about?  
18 **A. I don't recall. Maybe if you trigger my memory**  
19 **a little bit.**  
20 Q. No, there is no secret answer. I am just ...  
21 **A. So.**  
22 Q. Okay. And then, let's see, Friday, or last  
23 week -- I'm not sure it was Friday -- counsel sent me  
24 this. We'll mark that as 26.

12 (Pages 278 to 281)

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1 (Snyder Deposition Exhibit No. 26 was  
2 marked for identification.)  
3 BY MS. DIBIANCA:  
4 Q. Have you seen that before?  
5 **A. Yes. I supplied it to you.**  
6 Q. Oh, okay. Could you tell me what it is, then?  
7 **A. It is a form, an evaluation, from a -- I don't**  
8 **know much of the difference between a psychiatrist --**  
9 **I think I am saying it right. It's a form of an**  
10 **evaluation from a psychiatrist.**  
11 Q. And what was the psychiatrist's name?  
12 **A. Well, it says, "David Kalkstein."**  
13 Q. Then something is marked out there and then it  
14 says, "& Associates"?  
15 **A. Comma M.D. -- Something is blurred out -- &**  
16 **Associates.**  
17 Q. Is Dr. Kalkstein the psychiatrist that you saw?  
18 **A. You know what, I don't even recall his face. I**  
19 **don't even remember going to him. It was a one-time**  
20 **visit for an evaluation.**  
21 Q. Okay.  
22 **A. So I think I answered you improperly before**  
23 **because you asked me that before and I told you, no,**  
24 **and apparently I did. So I think I answered you**

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1 **untruthfully or wrong last time.**  
2 Q. Okay.  
3 **A. You asked me if I ever seen a psychiatrist. I**  
4 **don't know that -- I didn't remember this. It was a**  
5 **one-time evaluation. So I apologize.**  
6 Q. Okay.  
7 **A. So. I didn't know about this at all. I didn't**  
8 **remember.**  
9 Q. When did you recall it?  
10 **A. I think they called me telling me that you were**  
11 **trying to get some information and would I release it.**  
12 Q. Okay.  
13 **A. Okay. I said, "Yes." I said, "Send me the**  
14 **form so I can sign it." I said, "Can you send me a**  
15 **copy of whatever you have, too?" Like you gave me**  
16 **copies. And so I decided to make it quicker for**  
17 **everybody and I just took this into their office and**  
18 **made a copy for you guys.**  
19 Q. Okay.  
20 **A. You may have received something from them. I**  
21 **don't know.**  
22 Q. No, not yet.  
23 **A. But this is what you are going to receive.**  
24 Q. Right.

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1 **A. So I just thought I'd make it quicker. Sorry.**  
2 Q. And whoever the psychiatrist was in this  
3 office, whether it was Kalkstein or someone else, why  
4 did you see them?  
5 **A. I needed to get on some medicine. I needed to**  
6 **be approved that I wasn't going to kill another**  
7 **human-being or kill myself. I needed to be approved**  
8 **that I wasn't that depressed or -- even though we're**  
9 **all crazy in our own way -- I wasn't out there, you**  
10 **know.**  
11 Q. How did you find their office?  
12 **A. I don't know. I think my liver doctor might**  
13 **have called them or set me up with an appointment.**  
14 **You know how like if one doctor will say, okay, I want**  
15 **you to go to this doctor for a test and like the**  
16 **receptionist will just set you up with an appointment**  
17 **and point you in that direction. I think they just**  
18 **set me up with them. I don't know. I didn't look for**  
19 **them.**  
20 Q. Were you experiencing depression at this time?  
21 **A. Well, no. I mean, I wasn't depressed, you**  
22 **know, in -- about life in general, but I was still**  
23 **bothered by -- which I still very much am -- CitiSteel**  
24 **but that's not enough to want to kill yourself or want**

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1 **to kill somebody else. You know what I mean? There**  
2 **is a borderline. When it comes to your health, you**  
3 **have to continue on and take care of yourself no**  
4 **matter what is going on in life. You know, you are**  
5 **not going to neglect your health, so.**  
6 **Did I answer that okay? There's my answer.**  
7 Q. I can't read his or her handwriting.  
8 **A. Ain't no doctors you can read their**  
9 **handwriting, period. So.**  
10 Q. So he or she -- is it he?  
11 **A. Well, I guess. His name is David.**  
12 Q. Okay. Did he then give you clearance to go --  
13 **A. Yes.**  
14 Q. I'm sorry. I am going to finish the question.  
15 **A. Oh. Sorry.**  
16 Q. Did he give you clearance to go back to the  
17 liver doctor saying you were not depressed and you  
18 were able to take the medicine?  
19 **A. Yes. He approved me, yes.**  
20 Q. He did not require any kind of follow-up  
21 treatment?  
22 **A. To come back with him?**  
23 Q. Right.  
24 **A. No.**

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13 (Pages 282 to 285)

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1 Q. He didn't prescribe any kind of medication?  
2 **A. No.**  
3 Q. When did the liver doctor -- what's the name of  
4 that doctor? It's Beswick?  
5 **A. Yeah, it's Beswick. But I only met with him**  
6 **like maybe once or twice. He, I think he's the main**  
7 **doctor for Gastroenterology Associates. Forgive me**  
8 **for not being able to pronounce that either correctly.**  
9 **It was Stacey Mandichak that I would see every time,**  
10 **you know.**  
11 Q. When was the last time you talked to Stacey  
12 Mandichak?  
13 **A. A week before she was leaving. She was going**  
14 **up to a university in Philadelphia. She was leaving.**  
15 **She was going to start doing something else or**  
16 **something.**  
17 Q. Okay. So when did --  
18 **A. July. I'm sorry. Did I say that?**  
19 Q. That's fine. July is fine.  
20 **A. This year, 2006.**  
21 Q. So when did she first tell you, either her or  
22 Dr. Beswick, tell you that you needed an evaluation  
23 from a psychiatrist or a therapist?  
24 **A. Well, I guess when I first went to them because**

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1 **I wanted to do the medicine, you know, to help myself,**  
2 **to lock the disease into remission, you know. I guess**  
3 **in the very beginning when I went to them because they**  
4 **wouldn't let me get on the medicine until I got**  
5 **approved by Kalkstein. The psychiatrist. Put it that**  
6 **way.**  
7 Q. That would have been when?  
8 **A. I don't know. Well, the date that I seen him**  
9 **says, that I seen a psychiatrist, says, "12/21/04."**  
10 **So whenever -- I don't know how long it took for me,**  
11 **like -- how do I say it? I have one doctor, when they**  
12 **give you an appointment, it takes a month. You don't**  
13 **get to see him, he's that booked. So whenever the**  
14 **last time I seen the liver doctor, whatever they set**  
15 **me up for for this date, appointment -- in other**  
16 **words, I don't remember the date when they recommended**  
17 **me to go there. Put it that way. I don't remember.**  
18 Q. Okay. When you -- okay. Let's see. Did you  
19 have Cynthia Wright contact them?  
20 **A. Cynthia Wright had nothing to do with them. He**  
21 **was appointed from the liver doctor. Do you see what**  
22 **I am saying?**  
23 MS. BREWINGTON: Who is "he," Kalkstein?  
24 THE WITNESS: Yes. I'm sorry. I have to

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1 say this out loud on the record. The psychiatrist,  
2 Kalkstein was appointed -- the liver doctor pulled  
3 him, did him. I don't know how else to say it.  
4 MS. DIBIANCA: Recommended --  
5 THE WITNESS: Recommended. There you go.  
6 Yeah. Like I had no choice. You know what I mean? I  
7 didn't -- I don't know a psychiatrist. When they told  
8 me, they just set me up with him or called. I don't  
9 know how -- I don't remember at all.  
10 BY MS. DIBIANCA:  
11 Q. Who was your -- who diagnosed you with, first,  
12 with the liver disease?  
13 **A. Dr. Goodman.**  
14 Q. Then he referred you to gastroenterology?  
15 **A. No. I think he recommended to Benes. I think**  
16 **I only went to him once or twice. And to be honest, I**  
17 **don't even know why I didn't continue and stay with**  
18 **him, but I quickly moved on to gastroenterology or let**  
19 **me say, Beswick, but I don't know how or why I moved**  
20 **on to him. I remember walking -- I don't remember**  
21 **Benes's face, put it that way, if I even did need him.**  
22 **Maybe one of his associates. You know, sometimes how**  
23 **they have their interns or something that may refer --**  
24 **I don't remember. I remember going in there and**

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1 **signing something to get my records to give them to**  
2 **Beswick. That's all I remember. Or having them sent**  
3 **to Beswick. That's all I remember, to be honest with**  
4 **you.**  
5 Q. So that first doctor, Benes was -- how do you  
6 spell it?  
7 **A. B-E-N-N-I-S, I guess is what it sounds like.**  
8 Q. He or his office, you were not there for any  
9 significant treatment?  
10 **A. No. I don't even remember being back in a**  
11 **doctor's room. I do remember being in the waiting**  
12 **room, once. And that was to sign a release, so I ...**  
13 **If you have a document saying that I seen him, then I**  
14 **seen him. I apologize.**  
15 Q. No. It's not a trick question.  
16 So when you --  
17 **A. Oh, I know when you are throwing a trick**  
18 **question. Believe that, Molly.**  
19 Q. There is no trick questions.  
20 When you saw Mandichak and Beswick from the  
21 time you started until the time you stopped seeing  
22 them, was it 2006?  
23 **A. I still see them.**  
24 Q. Okay. When you were on the medication, did

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14 (Pages 286 to 289)

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1 they have to continue to monitor you for symptoms of  
2 depression?  
3 **A. Well, they would ask me questions. But they**  
4 **monitored my blood, actually.**  
5 Q. Okay. Were you -- did you have symptoms of  
6 depression during the time you were being seen by  
7 them?  
8 **A. Like I said, even to this day, I'm still**  
9 **bothered by you and CitiSteel. I mean, I think it's**  
10 **all bull crap, you know. But, other than that, like I**  
11 **said, there is nothing in life to make you want to**  
12 **jump off a bridge, or shouldn't be. You have to deal**  
13 **with your health, so, you know. Yeah, still**  
14 **depressed, even now, over CitiSteel.**  
15 Q. But they let you continue on the medicine?  
16 **A. Yes, ma'am.**  
17 Q. So that you were not serious --  
18 **A. Crazy enough or suicidal, yeah, so.**  
19 Q. Okay.  
20 **A. Whether you are depressed or not, you have to**  
21 **do what you have to do for your health, so.**  
22 Q. Okay. So you were -- I'll go ahead and admit  
23 this.  
24 (Snyder Deposition Exhibit No. 27 was

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1 marked for identification.)  
2 (Discussion off the record.)  
3 BY MS. DiBIANCA:  
4 Q. Okay. These are, I'll represent to you these  
5 are the records we received from Gastroenterology.  
6 **A. Yes.**  
7 Q. The first page here is dated November 19th,  
8 2003.  
9 **A. Okay.**  
10 Q. It's signed by Stacey Mandichak?  
11 **A. Where? This is Goodman's form. Are you on the**  
12 **top form?**  
13 Q. The first page of that carried onto the second  
14 page, it looks like. There's a page 2.  
15 **A. Okay.**  
16 Q. It looks like Stacey Mandichak there.  
17 **A. Okay.**  
18 Q. Sorry. I didn't mean to switch. The first  
19 page actually is what we're going to talk about. It  
20 says in the second sentence, "She was diagnosed,"  
21 "she" referring to you, back in July 2003." Is that  
22 correct to your recollection?  
23 **A. Yes.**  
24 Q. And this is all sort of background information

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1 here. But at the very bottom where it says, "Review  
2 of Symptoms" in capital letters --  
3 **A. I'm sorry. Where are you at?**  
4 Q. "Review of Symptoms."  
5 **A. Oh, okay, okay. Yeah.**  
6 Q. "Significant only for depression."  
7 **A. Okay.**  
8 Q. So you were depressed when you saw her in July  
9 2003?  
10 **A. Sure.**  
11 Q. And you were -- it says, "She is currently  
12 seeing a counselor by the name of Cindy Wright."  
13 Correct?  
14 **A. Correct, yes.**  
15 Q. So does this help you recall when you went to  
16 meet with them for the first time in July sort of the  
17 circumstances around that?  
18 **A. I do not remember meeting them for the very**  
19 **first time. No, I don't.**  
20 Q. Then when you went back -- July, and then this  
21 letter is dated November the same year. So  
22 approximately four months. Why did you have to wait  
23 four months to go back?  
24 **A. I don't understand.**

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1 MS. BREWINGTON: Did she go to them in  
2 July?  
3 MS. DiBIANCA: No. Lori, I'm sorry.  
4 MS. BREWINGTON: Okay.  
5 MS. DiBIANCA: You are correct. She was  
6 diagnosed in July.  
7 MS. BREWINGTON: Right.  
8 BY MS. DiBIANCA:  
9 Q. I'm sorry. So this would have been the first  
10 time then. Okay. Then that's my error. Let me  
11 correct myself on the record. You were diagnosed in  
12 July but didn't see Gastroenterology until November.  
13 **A. I guess. If that's what it says.**  
14 Q. You don't have any reason to think that's  
15 incorrect?  
16 **A. No. I have no reason.**  
17 Q. Okay. Then if you would turn one, two, three  
18 pages.  
19 **A. Do you want me to flip the third or go on the**  
20 **third?**  
21 Q. Flip the third.  
22 **A. Okay.**  
23 Q. The last full paragraph states.  
24 **A. I'm sorry. The last four paragraphs?**

15 (Pages 290 to 293)



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1 Q. Full, I'm sorry, full paragraph. The third  
2 paragraph down.  
3 **A. Four paragraphs. What?**  
4 Q. Third paragraph. I'm sorry?  
5 **A. Where it says, "She will follow up"?**  
6 Q. Yes.  
7 **A. Okay. What about it?**  
8 Q. This was December. So it was about a month  
9 later, again, by Stacey Mandichak. It states there is  
10 some concern that "she," meaning you, "may not be a  
11 candidate for treatment due to her mental illness  
12 history." Is that referring to depression?  
13 **A. I honestly don't know why they put that. If**  
14 **you notice, the date is two days before I had to be**  
15 **evaluated.**  
16 Q. Okay.  
17 **A. I think they say that about, you know, just in**  
18 **regards to anybody. You have to be a good candidate,**  
19 **an okay candidate to get on the treatment. So this is**  
20 **dated December 19th where I got evaluated on the 21st.**  
21 Q. That's the Snyder 26?  
22 **A. Yes.**  
23 Q. Right?  
24 **A. So I -- you know, I think they just said that**

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1 **in regards to everybody. You can call them and ask**  
2 **why they have that there. I really don't know. I**  
3 **don't have a past record of a mental illness, so, you**  
4 **know, other than being depressed and being tortured by**  
5 **CitiSteel.**  
6 Q. Do you think that's what they were referring  
7 to?  
8 **A. I have no clue.**  
9 MS. BREWINGTON: I object. Speculation.  
10 THE WITNESS: I have no clue.  
11 MS. BREWINGTON: Can I object? Calls for  
12 speculation. Ms. Snyder, you can answer the question.  
13 THE WITNESS: I have no clue. You would  
14 have to ask them, ma'am.  
15 BY MS. BREWINGTON:  
16 Q. Then we'll just skip. Try three more. Four  
17 more. There is a "C1" down at the bottom.  
18 **A. Yes. Keep going ?**  
19 Q. It's the next like written note.  
20 MS. BREWINGTON: Okay.  
21 Q. February 11th.  
22 **A. Okay.**  
23 Q. So this would have been less than two months  
24 after you had seen Dr. Kalkstein's office for the

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1 psychiatric evaluation?  
2 **A. The date on this form, on C1, says.**  
3 **"February 11th, 2004." So.**  
4 Q. Okay. So it states in here -- this is actually  
5 by Dr. Beswick, just saying that you had already come  
6 in for treatment, and then it says, "The decision  
7 treat is complicated by her ongoing depression and her  
8 unwillingness to have any communication done between  
9 us and her treating psychiatrist in terms of her  
10 therapy," et cetera. End quote.  
11 **A. I'm sorry. Can you, please -- I don't even**  
12 **know where you are reading.**  
13 Q. Sure.  
14 **A. Can you either show me or read it again?**  
15 Q. Starting right here.  
16 **A. Okay.**  
17 Q. And then carrying on.  
18 **A. Okay. I never had a treating psychiatrist, so,**  
19 **again, I don't -- everybody in the world makes**  
20 **mistakes every day. So why they put to "have any**  
21 **communication between us and her treating**  
22 **psychiatrist," I don't know why they put that because**  
23 **I never had a psychiatrist. I went to a psychiatrist**  
24 **one time in my life, and that was Kalkstein because**

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1 **they sent me there. So I don't -- I have no clue. I**  
2 **don't know why they put any of that. You'd have to**  
3 **ask them and then they'd have to, I don't know,**  
4 **produce something.**  
5 Q. Did you get -- so you wouldn't have turned  
6 in -- would you have turned in that Kalkstein  
7 evaluation form at that time?  
8 **A. Well, they got it from them. He had to approve**  
9 **me to them. So I didn't have nothing to turn in. I**  
10 **just received this in the mail a couple weeks ago, so.**  
11 Q. So Kalkstein's office would have sent it  
12 directly to Beswick?  
13 MS. BREWINGTON: Objection. Calls for  
14 speculation.  
15 **A. Well, yeah, because they sent me to him.**  
16 **They're the ones that sent me to him.**  
17 Q. I can re-ask it better than that. Kalkstein  
18 did not send the evaluation to you directly?  
19 **A. No. Just a couple weeks ago.**  
20 Q. Right, right. But I mean at that time they  
21 didn't?  
22 **A. No.**  
23 Q. Okay. I'm just trying to figure out why they  
24 wouldn't have gotten the clearance at this point.

16 (Pages 294 to 297)



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1 **A. Well, eventually they did because they let me**  
2 **start the medicine.**  
3 Q. Right.  
4 **A. So they had to have gotten something.**  
5 Q. Right. They do, definitely.  
6 **A. So I think that's a big little error. I don't**  
7 **know.**  
8 Q. What about that same paragraph there, but the  
9 last sentence where it states, "I'm hesitant to  
10 consider her for treatment at this time until her  
11 depression is under better control. (She" --  
12 **A. They were worried about me because of**  
13 **CitiSteel. I interrupted you. I'm sorry.**  
14 Q. That's okay. I'll finish the sentence just for  
15 the record. "(She was sobbing in our waiting room)," --  
16 et cetera. Go ahead.  
17 **A. They were worried about me because of**  
18 **CitiSteel.**  
19 Q. Okay.  
20 **A. Yeah. That I wouldn't be strong enough to**  
21 **maintain and take care of my health. You know, I had**  
22 **to take a grip, in other words.**  
23 Q. So at this time when he wrote this progress  
24 report here on February 11th, 2004, you were still

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1 upset at this time?  
2 **A. With CitiSteel? Sure.**  
3 Q. It says, "She was sobbing in our waiting room."  
4 **A. I have never sat in their waiting room and**  
5 **cried. I don't know where they get that.**  
6 Q. No?  
7 **A. And at that the doctor never came out directly**  
8 **and got me. It was always a little medical assistant,**  
9 **so. Unless he seen me crying, I don't know how he**  
10 **could type that.**  
11 Q. So you weren't crying in their waiting room?  
12 **A. I don't recall ever crying in any waiting room,**  
13 **to be honest with you.**  
14 Q. At this time would you agree with him writing  
15 here --  
16 **A. I wouldn't agree, basically, with any of this**  
17 **stuff so far.**  
18 Q. Okay.  
19 **A. I don't know where he gets it.**  
20 Q. I'm sorry. I cut you off that time.  
21 **A. That's all right. I've done you.**  
22 Q. At this time you already had the note -- well,  
23 you didn't have the note, but you had already seen  
24 Kalkstein?

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1 **A. Of course. Well, yeah, because of the dates,**  
2 **yes.**  
3 Q. Okay. So for him to say "your depression at  
4 this time" meaning February 11th, that's inaccurate;  
5 is that right?  
6 **A. What?**  
7 Q. He's saying here in this note on February 11th,  
8 2004 that you were depressed.  
9 **A. Well, I was still depressed; I still am now.**  
10 Q. But in Kalkstein's letter, then, you are not.  
11 I am trying to figure out which one is right.  
12 **A. Like I said, I have been depressed the entire**  
13 **time. Look at these people. Look what's going on up**  
14 **to this moment, this very moment here and now. I**  
15 **am -- yeah. I am bothered by it --**  
16 Q. Right?  
17 **A. -- point-blank, but. Yeah, I got approved to**  
18 **be on the medicine. I am not thinking about killing**  
19 **myself. There is nothing in this world to make me**  
20 **even think about being unappreciative of the gift I**  
21 **was given, and that's to breathe this air. But, yeah,**  
22 **I was okay enough to get on the medicine to take care**  
23 **of my health. Wouldn't you?**  
24 Q. So why did he think that, Kalkstein, and then

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1 Goodman --  
2 **A. Think what?**  
3 MS. BREWINGTON: Objection calls for  
4 speculation.  
5 Q. -- Beswick did not --  
6 **A. Well, it doesn't matter because he ended up,**  
7 **eventually, letting me get on the medicine. So why**  
8 **wrote any of this or typed it, you'll have to call him**  
9 **and ask him.**  
10 Q. Okay.  
11 **A. Because I don't know. This here totally**  
12 **collides with him letting me get on the medicine. So**  
13 **he's saying one thing, but he did another.**  
14 Q. Yes.  
15 **A. He gave me the medicine. Right? So why I**  
16 **don't know.**  
17 Q. Okay.  
18 **A. You know. I think as time passes, time heals**  
19 **all wounds, you know, so. I didn't start the medicine**  
20 **till January 2005. So I think they gave me time to**  
21 **think about it and let me overcome CitiSteel ripping**  
22 **my whole little world out from under me, you know. I**  
23 **don't think they jump and let anybody start on**  
24 **medicine. You would have to call and ask them. It's**

17 (Pages 298 to 301)

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1 **a big thing, that medicine, so, you know.**  
2 Q. Okay.  
3 **A. That's the best answer I can give you. I'm**  
4 **sorry.**  
5 Q. Okay. Then let's go three more pages, on the  
6 third page after that, marked 237. This appears to be  
7 the date you were just referring to, January 2005,  
8 when they did approve you for the treatment.  
9 **A. Yes, ma'am. Yes.**  
10 Q. And so at this point, they must have received  
11 Dr. Kalkstein's note that says -- I am reading, going  
12 to read from here -- that "She has no signs or  
13 symptoms of depression currently and does not need any  
14 medications or follow-up at this time."  
15 **A. Yes. That's what it says, yes.**  
16 Q. So there must have been some delay in him  
17 getting them the note, I suppose.  
18 **A. I don't know. I have no clue.**  
19 Q. No. I'm sorry. I wasn't -- speculating  
20 myself.  
21 Let's skip way ahead. We'll do, say, like  
22 five pages. I apologize that these aren't in order.  
23 **A. Five pages. Keep flipping them up?**  
24 Q. Yes. Where the date is April 8, 2005 up at the

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1 top. Maybe not.  
2 **A. It says, "March 18th." Okay. All right.**  
3 **April 8th.**  
4 Q. Perfect. That's fine. In the first paragraph  
5 it says -- the last sentence of the first paragraph --  
6 "She denies depression, suicidal or homicidal  
7 ideation." She states, "She is having 'no  
8 side-effects' from her medication."  
9 **A. Yeah.**  
10 Q. That was consistent throughout your course of  
11 treatment?  
12 **A. I didn't go to jail for killing nobody, so,**  
13 **yeah. Yes. The answer is yes.**  
14 Q. Okay.  
15 **A. It didn't make me freak out.**  
16 Q. It did not?  
17 **A. It did not.**  
18 Q. Okay.  
19 **A. Still here. So is everybody else I know, so.**  
20 Q. I think that's all I have for that one.  
21 Now, had you ever been treated for  
22 depression prior to Citi -- prior to April 2003?  
23 **A. No. Not that I know of, no.**  
24 Q. Do you recall a prescription for Wellbutrin?

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1 Ever been on Wellbutrin?  
2 **A. Yeah. But I think that was for not smoking or**  
3 **something, and it made my mouth taste funny or**  
4 **something. And I remember asking -- I don't even know**  
5 **who it was -- Somebody at CitiSteel, was taking it for**  
6 **depression or something. But I saw on commercials it**  
7 **would show for depression and not smoking, so I was**  
8 **confused on that. I don't know why somebody --**  
9 **whatever doctor gave that to me, yeah.**  
10 Q. Do you recall being on it?  
11 **A. I remember taking it. I quit taking it**  
12 **immediately because it made my mouth taste weird and**  
13 **didn't make me stop smoking. It may have been**  
14 **Dr. Goodman gave it to me to try to help me quit**  
15 **smoking, even though like one pack of cigarettes will**  
16 **last me three days. I am not a chain smoker. I don't**  
17 **smoke a lot, so. Every time I go in there,**  
18 **Dr. Goodman will say, "Did you quit smoking yet?"**  
19 Q. So nothing other than that, then?  
20 **A. No. Not that I recall.**  
21 Q. How about the tapes? Have you done those yet?  
22 Have you had an opportunity to review the transcripts?  
23 **A. You know what. I do apologize. I am not done.**  
24 **Yeah, I am not done. I do apologize. I swear, I will**

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1 **get them done within the week. Can we try a week,**  
2 **something? Promise.**  
3 Q. You tell me. I am eagerly awaiting their  
4 return.  
5 **A. It is so much, it is so much. I am not a**  
6 **lawyer. You guys work around the clock, I mean, you**  
7 **know. I have been getting headaches lately. I do**  
8 **apologize deeply.**  
9 Q. Do you understand what we're asking --  
10 **A. Yes.**  
11 Q. -- you to do with them?  
12 **A. Yes.**  
13 Q. You do?  
14 **A. Yes. Sit there and listen to them and read**  
15 **word for word.**  
16 Q. Right. Because I'll just tell you so you hear  
17 it from me. I had them done here just in our word  
18 processing department. So there is going to be  
19 likely, I would presume, errors.  
20 **A. Oh, God. Well, I started --**  
21 Q. Go ahead.  
22 **A. I started to go through with it. And whatever**  
23 **that name is Michael Holt or Haut, whatever, I never**  
24 **heard it before in my life. I know there is no way**

18 (Pages 302 to 305)

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1 **it's on any of the tapes. I understand what you are**  
2 **saying, there is going to be errors, period.**  
3 Q. Yes. That way you can just go through it and  
4 make sure. Because you were actually there, so you  
5 would know better than us guessing.  
6 **A. I understand. I know.**  
7 Q. So we'll look for those. Can I take a break?  
8 I don't think I have any more questions. I want to  
9 skim through for a minute or two to make sure I am not  
10 leaving anything out.  
11 **A. You had a document to go back to, remember.**  
12 Q. No. We got it.  
13 **A. You got it.**  
14 Q. So we'll just take a few more minutes?  
15 **A. You mean we're almost done for the day?**  
16 Q. Mm-hmm.  
17 **A. Oh.**  
18 **(Recess taken.)**  
19 MS. DiBIANCA: What we'll do is we'll move  
20 one into the record just so there is a copy attached  
21 to the transcript so the you have it later if you need  
22 it.  
23 THE WITNESS: I couldn't remember. So.  
24 There you go. That's all.

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1 MS. DiBIANCA: This is, for the record, a  
2 signed medical authorization and release by  
3 Ms. Snyder, dated January 20th, 2006.  
4 (Snyder Deposition Exhibit No. 28 was  
5 marked for identification.)  
6 MS. DiBIANCA: We're going to move these in  
7 as Snyder 29.  
8 (Snyder Deposition Exhibit No. 29 was  
9 marked for identification.)  
10 BY MS. DiBIANCA:  
11 Q. So these are a few pages from Dr. Goodman's  
12 file or your file with Dr. Goodman. The date on the  
13 first page -- this is one of the documents you gave  
14 us. You can see there is a "P" at the bottom of the  
15 page.  
16 **A. Huh? In what? No.**  
17 Q. Bottom right-hand corner. Maybe this is not on  
18 your copy. I'm sorry. I'm looking at the second  
19 page, Terry. I'm sorry.  
20 **A. Flip it?**  
21 Q. Back up. I'm sorry. The first page is dated  
22 January 9?  
23 **A. It's stamped "January 9, 2002." Yes.**  
24 Q. And about halfway down it says,

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1 "psychological."  
2 **A. Okay.**  
3 Q. "No anxiety or depression." That's the  
4 typewritten part.  
5 **A. Yes.**  
6 Q. Then on the line under that, can you read what  
7 that says?  
8 **A. No.**  
9 Q. It appears to say, "Depression - mild"?  
10 **A. It says what?**  
11 Q. "Depression - mild"?  
12 **A. I can't make it out at all. I don't know.**  
13 Q. Do you remember having mild depression in  
14 January 2002?  
15 **A. No. There could have been something going on**  
16 **in life that upset me for a little bit or something.**  
17 **I don't really know.**  
18 Q. And then it says -- it indicates that your sort  
19 of follow-up plan with that was going to be start  
20 working out in the gym and lose weight.  
21 **A. Maybe I was bothered by me putting on weight or**  
22 **something like that.**  
23 Q. Okay. Right at the top, "Chief Complaint," it  
24 says, "Test Results, Gaining Weight."

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1 **A. Well, my boyfriend was feeding me at night, so,**  
2 **while I was actually sleeping and I put on a few**  
3 **pounds. And I'd usually go to the gym regularly. And**  
4 **especially during my CitiSteel years, I would go at**  
5 **5:00 in the morning and then I would go 9:00 at night,**  
6 **usually. Sometimes 7:00 or 8:00. But I have always**  
7 **been a gym girl, and, you know, things like that. I**  
8 **thought something may have been wrong with me why I**  
9 **was putting on weight. I found out that he was**  
10 **feeding me while I was sleeping.**  
11 Q. Really feeding you while you were sleeping?  
12 **A. Swear, yeah.**  
13 Q. How so?  
14 **A. He said that I would lay there and go,**  
15 **(demonstrating) I would go along with it. He kept**  
16 **doing it. He started asking me if I enjoyed what I**  
17 **had last night. Yeah, and so. I actually woke up**  
18 **when he was putting peanuts in my mouth and got very**  
19 **angry. You could die. You can't feed somebody**  
20 **peanuts... Excuse my language -- sleeping, you know.**  
21 **I was mad. Just bothered by putting on a few pounds.**  
22 **Who wouldn't be? You know. I wasn't depressed, stuff**  
23 **like -- you know. I don't know why, you know.**  
24 Q. And then the only other question I have for

19 (Pages 306 to 309)

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1 today is for the last -- we've had a few cancellations  
2 for today. Were you able to go to the doctor for any  
3 of those cancellations?  
4 **A. What does that mean?**  
5 Q. Did you -- when you canceled the last  
6 deposition --  
7 **A. Oh, yes. I apologize. Yes, yes.**  
8 Q. You did go to the doctor's?  
9 **A. Oh, yes.**  
10 Q. When did you go to the doctor's?  
11 **A. It was on a Monday. I was going to go to the**  
12 **Emergency Room. Well, I asked my cousin that I do**  
13 **everything for. I do anything for anybody. She never**  
14 **showed up. She was going to drive me because I was**  
15 **scared to drive. I couldn't drive. And I was going**  
16 **to go to the Emergency Room. And actually the more I**  
17 **thought about it, I was glad she didn't show up**  
18 **because I probably wouldn't have survived in an**  
19 **Emergency Room. I don't know if you hear me over here**  
20 **moaning and groaning and just, you know, my whole head**  
21 **neck and head is hot. I think you can see it in my**  
22 **face. You know how you don't feel good it comes out**  
23 **of you. I don't feel good now, either. They were**  
24 **really bad. I didn't want to move my jaw. I went in**

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1 the doctor's office. I drove myself on, it was a  
2 Monday, I guess it was. Whatever date that was.  
3 Q. I don't know the date either. Was that  
4 Dr. Goodman's office?  
5 **A. It was his office. But I -- I wanted -- he**  
6 **wasn't in. I wanted to see any doctor. Or did I go**  
7 **on that Saturday? No. I seen Christine something.**  
8 **She works with him. She's one of the doctors in his**  
9 **office.**  
10 Q. Okay. Did she give you any medicine or  
11 prescription?  
12 **A. Yeah.**  
13 Q. What did she give you?  
14 **A. She said that she thinks that I could be**  
15 **getting them from sinus, you know, maybe some type of**  
16 **sinus infection --**  
17 Q. Okay.  
18 **A. -- or allergies. She gave me nose spray and**  
19 **Claritin D, which I just took another one today and I**  
20 **just felt ... see anything working. She didn't X-ray**  
21 **my head. That's what I actually wanted, you know.**  
22 MS. DIBIANCA: That's all I have. We're  
23 done for today.  
24 (Deposition concluded at 12:04 p.m.)

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5 re: Terry Snyder  
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20 (Pages 310 to 313)

Snyder  
Terry L. Snyder, Volume 3

v.  
C.A. # 04-970 (JJF)

CitiSteel, USA, Inc.  
October 16, 2006

Page 314

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3 REPLACE THIS PAGE  
4 WITH THE ERRATA SHEET  
5 AFTER IT HAS BEEN  
6 COMPLETED AND SIGNED  
7 BY THE DEPONENT.  
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Page 315

1 State of Delaware )  
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3 New Castle County )  
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5 CERTIFICATE OF REPORTER  
6 I, Lucinda M. Reeder, Registered Diplomate  
7 Reporter, Certified Real-time Reporter and Notary  
8 Public, do hereby certify that there came before me on  
9 October 16, 2006, the witness herein, TERRY L. SNYDER,  
10 who was first duly sworn by me and thereafter examined  
11 by counsel for the respective parties; that the  
12 questions asked of said witness and the answers given  
13 were taken down by me in Stenotype notes and  
14 thereafter transcribed by use of computer-aided  
15 transcription and computer printer under my direction.  
16 I further certify that the foregoing is a true  
17 and correct transcript of the testimony given at said  
18 examination of said witness.  
19 I further certify that I am not counsel,  
20 attorney, or relative of either party, or otherwise  
21 interested in the event of this suit.  
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**WILCOX & FETZER LTD.**

**In the Matter Of:**

**Snyder**

**V.**

**CitiSteel, USA, Inc.**

**C.A. # 04-970 (JJF)**

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**Transcript of:**

**Jerome Downie**

**July 21, 2006**

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**Wilcox & Fetzer, Ltd.**

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**B- 0336**



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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,	)	
	)	
Plaintiff,	)	
	)	Civil Action
v.	)	No. 04-970
	)	(JJF)
CITISTEEL USA, INC.,	)	
	)	
Defendant.	)	

Telephonic deposition of JEROME DOWNIE  
taken pursuant to notice at the law offices of  
Margolis Edelstein, 1509 Gilpin Avenue, Wilmington,  
Delaware, beginning at 1:05 p.m. on Friday, July 21,  
2006, before Kathleen White Palmer, Registered Merit  
Reporter and Notary Public.

APPEARANCES:

LORI A. BREWINGTON, ESQUIRE  
MARGOLIS EDELSTEIN  
1509 Gilpin Avenue  
Wilmington, Delaware 19806  
for the Plaintiff

(Via teleconference):  
MARGARET M. DiBIANCA, ESQUIRE  
YOUNG CONAWAY STARGATT & TAYLOR  
1000 West Street - 17th Floor  
Wilmington, Delaware 19899-0391  
for the Defendant

ALSO PRESENT:

TERRY L. SNYDER

B-0337

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1 JEROME DOWNIE,  
2 the witness herein, having first been  
3 duly sworn on oath, was examined and  
4 testified as follows:  
5 BY MS. BREWINGTON:  
6 Q. Good afternoon, Mr. Downie. How are you?  
7 A. Fine.  
8 Q. Good. I'm going to ask you a series of  
9 questions today. My name is Lori Brewington and I  
10 represent Terry Snyder in a discrimination or sexual  
11 harassment action against CitiSteel.  
12 I'm going to ask you a series of questions  
13 and I'll make every effort to ask them one at a time.  
14 We definitely have to make sure that, because we are  
15 taking your deposition by phone, that we take turns  
16 speaking so that the court reporter can clearly  
17 transcribe everything that we're saying.  
18 If at any time you need to take a break  
19 today, just let me know and we will go off the record.  
20 Please start by stating your name for the  
21 record?  
22 A. My name is Jerome Downie.  
23 Q. Where do you currently work?  
24 A. I am retired. I am a consultant with CitiSteel

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1 ending this month.  
2 Q. Why is your consulting work ending with  
3 CitiSteel this month?  
4 A. Because I was on a one-year contract extended  
5 one more year and the year is concluding this July,  
6 this month.  
7 Q. Where do you currently reside?  
8 A. I live in Celebration, Florida.  
9 Q. Tell me about your work as a consultant for  
10 CitiSteel beginning with when you started and -- well,  
11 let's just start with when you started.  
12 A. I don't understand the question.  
13 Q. Okay.  
14 A. When I started at CitiSteel or when I started  
15 as a consultant?  
16 Q. Consultant.  
17 A. I voluntarily -- I retired from CitiSteel in  
18 2004, end of July, at which time CitiSteel requested  
19 me to be a consultant to follow up and answer  
20 questions from time to time.  
21 Q. What type of questions would you be answering?  
22 A. Anything that pertained to my job.  
23 Q. What would that be?  
24 A. Various things.

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1 Q. As a consultant, what are some of your job  
2 responsibilities?  
3 A. I am available for them to ask me questions,  
4 period.  
5 Q. What did the questions pertain to?  
6 A. What I did.  
7 Q. What did you do?  
8 A. I was director of human resources and corporate  
9 secretary.  
10 Q. So as a consultant, is it fair to say that  
11 CitiSteel would consult with you on human  
12 resources-related matters?  
13 A. Yes.  
14 Q. Did you consult them on any other matters  
15 besides human resources-related matters?  
16 A. No.  
17 Q. How often are you used as a consultant?  
18 A. Periodically.  
19 Q. What does "periodically" mean to you?  
20 A. It is varied. From time to time.  
21 Q. It's varied from time to time and periodically.  
22 So now I'm going to ask you: Once a month? Twice a  
23 month? Can you give me an example?  
24 A. That would be difficult for me to do.

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1 Q. Why would it be difficult?  
2 A. I just don't remember.  
3 Q. Well, when is the last time you consulted with  
4 CitiSteel?  
5 A. Maybe a month ago.  
6 Q. And before that?  
7 A. I don't remember.  
8 Q. So because you don't remember, is it fair to  
9 say that it was more than a month ago?  
10 A. No.  
11 Q. Was it so long ago that you can't remember?  
12 A. I'm busy with other things. It's hard for me  
13 to remember exactly the frequency.  
14 Q. A month ago you consulted with CitiSteel; is  
15 that correct?  
16 A. Yes.  
17 Q. What was that with respect to?  
18 A. I was called by Jim Ryan and told that I may be  
19 deposed in a case and that I may be getting a call  
20 from an attorney.  
21 Q. What case was that?  
22 A. The one we're discussing now.  
23 Q. So you were called by Jim Ryan and advised that  
24 you may be called concerning Terry Snyder's case?

2 (Pages 2 to 5)

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1 **A. That is correct.**  
2 Q. What else did Jim Ryan tell you?  
3 **A. Nothing more than that.**  
4 Q. How long was the conversation?  
5 **A. I don't recall.**  
6 Q. Do you recall whether it was an hour?  
7 **A. No.**  
8 Q. Do you recall whether it was like a half hour?  
9 **A. No.**  
10 Q. Do you recall whether it was like 15 to  
11 20 minutes?  
12 **A. I would say it was in minutes.**  
13 Q. Okay.  
14 **A. I don't remember how long.**  
15 Q. So as I understand it, he called you and told  
16 you that you may get a call concerning the Terry  
17 Snyder matter from an attorney. Did he say anything  
18 else?  
19 **A. No.**  
20 Q. Did you respond in any way?  
21 **A. No.**  
22 Q. Do you have any other jobs currently besides  
23 consulting with CitiSteel?  
24 **A. No. I'm retired.**

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1 Q. Why did you resign from CitiSteel in July of  
2 2004?  
3 **A. Because I retired. I voluntarily retired from**  
4 **the corporation.**  
5 Q. Now, when were you hired with CitiSteel?  
6 **A. In September of 1988.**  
7 Q. You worked at CitiSteel through July of 2004;  
8 is that correct?  
9 **A. As a permanent employee, yes.**  
10 Q. As a what? I'm sorry.  
11 **A. Permanent employee.**  
12 Q. Okay.  
13 **A. Yes.**  
14 Q. Prior to that, were you a temporary employee?  
15 **A. No, but I have been a part-time employee or**  
16 **consultant from July of '04 to now.**  
17 Q. Oh, okay. I understand. So let's talk about  
18 your employment at CitiSteel from September 1988  
19 through July of 2004. Okay?  
20 **A. (No response.)**  
21 Q. Is that okay with? Can you hear me?  
22 **A. Yes.**  
23 Q. Okay. Great.  
24 When you started in September of 1988, what

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1 were you hired as?  
2 **A. My position was director of human resources.**  
3 Q. Is that the position you held throughout July  
4 of 2004?  
5 **A. Yes.**  
6 Q. Terry Snyder was employed with CitiSteel from  
7 August of 2001 through April of 2003. Am I correct  
8 that you were the director of human resources at that  
9 time?  
10 **A. You're correct that I was director of human**  
11 **resources while she was employed. I don't exactly**  
12 **remember -- I don't remember the exact dates of her**  
13 **employment. Yes.**  
14 Q. What were some of your primary job  
15 responsibilities as the director of human resources?  
16 **A. Any and all matters related to the human**  
17 **resources function of the corporation.**  
18 Q. Would that include employee investigations?  
19 **A. Yes.**  
20 Q. Would it also include hiring and firing of  
21 employees?  
22 **A. Yes.**  
23 Q. Would it also include the transfer of  
24 employees?

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1 **A. Yes.**  
2 Q. Prior to this deposition today, did you receive  
3 documentation or exhibits that I intend to use today?  
4 **A. Yes, I did.**  
5 Q. Were you going to say something else?  
6 **A. I received -- I received documents and printed**  
7 **them from my computer yesterday.**  
8 Q. Have you had an opportunity to review the  
9 documents?  
10 **A. A little bit.**  
11 Q. Let me ask you a question. Have you talked  
12 with anyone besides Miss DiBianca in preparation for  
13 your testimony today?  
14 **A. No.**  
15 Q. When is the last time you spoke with Jim Ryan?  
16 **A. I don't remember. It was the time he called**  
17 **me.**  
18 Q. The time that we spoke about earlier?  
19 **A. Yes.**  
20 Q. One month ago?  
21 **A. As I recall, yes.**  
22 Q. When was the last time you spoke with Randolph  
23 Harris?  
24 **A. I have no idea. It's been awhile.**

3 (Pages 6 to 9)

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1 Q. Let me ask you a question. Were you a  
2 consultant for CitiSteel during the last time you  
3 spoke with Randolph Harris?  
4 **A. No.**  
5 Q. Were you the director of human resources during  
6 the last time you spoke with Randolph Harris?  
7 **A. Yes.**  
8 Q. How about Greg Buragino, when is the last time  
9 you spoke with Mr. Buragino?  
10 **A. I have no idea.**  
11 Q. Were you employed with CitiSteel as the  
12 director of human resources the last time you spoke  
13 with him?  
14 **A. Yes.**  
15 Q. As I'm sure you are aware, Terry Snyder has  
16 alleged in this case that Randolph Harris sexually  
17 harassed her. Are you aware of that?  
18 **A. I am aware of the allegation.**  
19 Q. When did you first become aware of the sexual  
20 harassment allegations against Randolph Harris by  
21 Terry Snyder?  
22 **A. I don't remember the date.**  
23 Q. I'll represent to you that Miss Snyder's  
24 employment ended -- I know there's some dispute as to

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1 **normally do, and then I discussed with him a path**  
2 **forward to investigate the matter.**  
3 Q. Did you have this discussion with him over the  
4 phone or face-to-face?  
5 **A. I believe it was face-to-face.**  
6 Q. In terms of your discussion of the path  
7 forward, I believe that's what you said, what was your  
8 path forward?  
9 **A. Meet the parties -- meet with -- notify**  
10 **management, meet with the parties involved, and**  
11 **investigate the matter, find out what happened.**  
12 Q. Did you meet with Terry Snyder the same day  
13 that you learned of the allegations?  
14 **A. I can't remember.**  
15 Q. Do you recall whether or not you met with  
16 Miss Snyder with Mr. Buragino?  
17 **A. I don't remember.**  
18 Q. Do you recall whether or not you had  
19 Miss Snyder make a statement of the alleged incidents  
20 of sexual harassment?  
21 **A. Yes, only because that would be my habit. In**  
22 **other words, I would always ask someone to please**  
23 **write down and document what they knew to be the facts**  
24 **or alleged facts in any matter.**

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1 whether she was terminated or not -- but her  
2 employment ended April 10th of 2003.  
3 Is it fair to say that you learned about  
4 these allegations prior to April 10th, 2003?  
5 **A. Yes.**  
6 Q. Would it also be fair that you learned about  
7 these allegations a few days prior to April 10th,  
8 2003?  
9 **A. Yes.**  
10 Q. How did you first become aware of these  
11 allegations?  
12 **A. To the best of my recollection, Mr. Buragino**  
13 **came to my office and told me about that.**  
14 Q. What did he say?  
15 **A. I don't remember the words.**  
16 Q. You don't remember the words.  
17 Do you remember anything that he may have  
18 said during that time? And I don't need the exact  
19 wording.  
20 **A. The thrust of what I recall he said was that**  
21 **Terry Snyder alleged that Randolph Harris had harassed**  
22 **her.**  
23 Q. Then what did you do next?  
24 **A. I listened to what he said, which I would**

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1 Q. I want to actually direct your attention to one  
2 of the exhibits that was sent to you. If you look at  
3 the bottom, the documents are Bates stamped with  
4 certain numbers, and the one that I want you to focus  
5 on is Bates stamped D373 and D374.  
6 MS. BREWINGTON: I'd like to have those  
7 marked, if I could.  
8 (Downie Exhibit 1 was marked for  
9 identification.)  
10 BY MS. BREWINGTON:  
11 Q. Do you have that document in front of you?  
12 **A. I have two pieces of paper. One is D373 and**  
13 **D374.**  
14 Q. Have you had an opportunity to review this  
15 document yet?  
16 **A. No.**  
17 Q. Can you go ahead and do that for me? I want to  
18 ask you about it.  
19 **A. (The witness reviews the document.) Yes.**  
20 Q. You've had an opportunity to review it. Okay.  
21 Do you see that this document is dated  
22 Tuesday, and I think that that is April 8th, 2003? Do  
23 you see that at the top?  
24 **A. Yes.**

4 (Pages 10 to 13)

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1 Q. It's a document written by Terry Snyder?  
2 **A. Yes.**  
3 Q. Does this document look familiar to you?  
4 **A. No.**  
5 Q. So you don't know whether or not you've ever  
6 seen it before?  
7 **A. I had to have seen it before. It's just been**  
8 **several years. I just don't remember it now.**  
9 Q. Is it fair to say that this is a statement that  
10 she drafted when you met with her?  
11 **A. Yes.**  
12 Q. Now I'd like to direct your attention to a  
13 document that is Bates stamped D375, D376, and D377.  
14 **A. I have them.**  
15 MS. BREWINGTON: We are going to have this  
16 marked as Downie 2.  
17 (Downie Exhibit 2 was marked for  
18 identification.)  
19 BY MS. BREWINGTON:  
20 Q. Take some time to review that document and let  
21 me know when you've had an opportunity to review it.  
22 **A. (The witness reviews the document.) I can see**  
23 **what it is.**  
24 Q. You can't see it?

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1 **A. I can -- I understand what it is.**  
2 Q. Okay. Tell me what it is.  
3 **A. This was written by Greg Buragino and is a**  
4 **documentation of events, as the title says,**  
5 **surrounding Terry Snyder's harassment charges.**  
6 Q. It's almost halfway down the page. It is a  
7 little above that, but it says: "Terry was called at  
8 the melt shop and asked to come to the personnel  
9 building to meet with Jerry and I. She arrived about  
10 1:55. Jerry told her that Dennis had informed us of  
11 her complaint and that we were following up, per  
12 policy, to investigate her claim and to help."  
13 Then it says: "From the conversation,  
14 these are the salient points I recall."  
15 Now, me reading that, does that help  
16 refresh your recollection as to whether or not  
17 Mr. Buragino was in the meeting with you on that date?  
18 **A. Yes, that's what it says.**  
19 Q. Do you have any reason to dispute that?  
20 **A. No.**  
21 Q. At the top of the page it says "On 4/8," so  
22 that would have been April 8th; is that correct?  
23 **A. That's what it says.**  
24 Q. Now, in that meeting, can you tell me anything

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1 that Ms. Snyder said to you?  
2 **A. Is your question can I tell you anything other**  
3 **than what's stated on these two exhibits?**  
4 Q. No. I actually don't want you to tell me based  
5 on those exhibits. If you can just tell me what you  
6 remember.  
7 **A. Okay.**  
8 **It has been some time since this happened,**  
9 **so I really don't recall the conversation much from my**  
10 **recollection.**  
11 **The thrust of, as I recall, the**  
12 **conversation was that Ms. Snyder was upset and wanted**  
13 **the company to know some information. And I told -- I**  
14 **listened. I listened and I indicated to her that this**  
15 **was -- this type of allegation is very serious. As a**  
16 **representative of the company, I would have to notify**  
17 **the president, and then I would have to investigate**  
18 **this. And I took it very seriously. And that we**  
19 **would get back to her on this matter.**  
20 Q. Did she mention anything about her father in  
21 that meeting?  
22 **A. Not that I recall.**  
23 Q. So she didn't request to have her father  
24 involved in the meeting, in any future meetings?

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1 **A. Are you asking me did --**  
2 Q. I'm sorry. I'll just go ahead and repeat or  
3 rephrase.  
4 Did Miss Snyder ask you if she could have  
5 her father in the meeting, any future meetings?  
6 **A. Okay. Let me respond this way.**  
7 Q. Okay.  
8 **A. In this particular meeting, I don't recall her**  
9 **mentioning her father.**  
10 Q. Okay.  
11 **A. In a future meeting, I do recall her mentioning**  
12 **her father.**  
13 Q. What do you recall about that meeting just with  
14 respect to her father? Because we'll get to that  
15 meeting.  
16 **A. What do I recall?**  
17 Q. Yes, about her father.  
18 **A. She stated that she -- it was something about**  
19 **she wanted her father to be present.**  
20 Q. In the meeting?  
21 **A. In a meeting, yes.**  
22 Q. Did you allow her to have her father present at  
23 the meeting?  
24 **A. No, I did not.**

5 (Pages 14 to 17)



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1 Q. Did she mention to you why she wanted her  
2 father present at the meeting?  
3 **A. There was no clear reason stated to me.**  
4 Q. Did you have an understanding of why she may  
5 want her father involved in the meeting?  
6 **A. My understanding would just be that she wanted**  
7 **someone else there to assist her.**  
8 Q. Why did you decline?  
9 **A. It's the practice of the company not to permit**  
10 **that.**  
11 Q. Not to permit her father or not to permit  
12 anyone to be in there as a witness for the person?  
13 **A. Not to permit -- my answer is not to permit**  
14 **people outside the company in company meetings.**  
15 Q. Did you offer or allow Terry to bring in a  
16 representative of her choice from CitiSteel to come  
17 into the meeting?  
18 **A. There was one there. There was one already**  
19 **there.**  
20 Q. Meaning Jim Ryan?  
21 **A. Yes.**  
22 Q. Was that a representative of Terry's choice?  
23 **A. No.**  
24 Q. Who asked Jim Ryan to attend this meeting?

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1 **A. I did.**  
2 Q. So was Jim Ryan a representative of your  
3 choice?  
4 **A. Yes.**  
5 Q. Have you told me everything that you can recall  
6 about your initial meeting with Miss Snyder?  
7 **A. The only thing I would say otherwise was there**  
8 **were lot of questions in my mind about things, so I**  
9 **made no conclusions or I really -- things were up in**  
10 **the air. I -- you know, I don't -- I didn't have any**  
11 **type of closure in my mind. That's the only thing I**  
12 **could say.**  
13 Q. So at the end of your meeting with Terry on the  
14 8th, you had no conclusion as to whether the sexual  
15 harassment had occurred or not? Is that fair to say?  
16 **A. Yes.**  
17 Q. Is it fair to say that the investigation had  
18 not ended at that point?  
19 **A. It hadn't begun.**  
20 Q. It hadn't begun. Okay. Is that because you  
21 still had other people to talk to; namely, Randolph  
22 Harris?  
23 **A. Yes.**  
24 Q. You said it hadn't begun, but it did, didn't,

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1 it, because you did speak with Terry? Or was that not  
2 part of the investigation?  
3 **A. I believe you're right.**  
4 Q. Okay.  
5 **A. I agree with you.**  
6 Q. Now, we're still on that first meeting that you  
7 had with Terry. Do you know or do you recall whether  
8 Terry mentioned tapes or diaries as evidence of the  
9 harassment at that point?  
10 **A. I don't know -- I don't remember when all that**  
11 **came up.**  
12 Q. You don't remember when it came up, but is it  
13 fair to say that you did know that it did come up?  
14 **A. Yes.**  
15 Q. How did it come up?  
16 **A. I don't remember.**  
17 Q. Is it fair to say that Miss Snyder volunteered  
18 the fact that she had tapes and diaries?  
19 **A. Yes.**  
20 Q. Did you ask to see these tapes and diaries on  
21 April 8th?  
22 MS. DiBIANCA: I'm just going to object  
23 just because I don't know that we've established the  
24 dates yet. But if we want to move forward on the

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1 presumption that April 8th is the date, that's fine.  
2 MS. BREWINGTON: Okay.  
3 Jerry, I'm sorry. You can go ahead and  
4 answer.  
5 **A. Ma'am, would you please restate the question?**  
6 MS. BREWINGTON: I don't really remember  
7 what I asked.  
8 What did I ask?  
9 (The reporter read from the record as  
10 requested.)  
11 BY MS. BREWINGTON:  
12 Q. Do you recall whether or not you asked to see  
13 the diaries or tapes?  
14 **A. I -- I don't remember the exact language about**  
15 **what I said or didn't say about the tapes.**  
16 Q. Okay.  
17 **A. I don't know if it came up on that date.**  
18 Q. Are you saying that it came up, but you're just  
19 not sure it came up on the 8th?  
20 **A. Yes. It didn't come up because I've said that**  
21 **already. Yes, it came up at one point in time, yes.**  
22 Q. Do you know whether it came up early on in your  
23 investigation?  
24 **A. I honestly don't remember.**

6 (Pages 18 to 21)

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1 Q. Were you interested in hearing the tapes after  
2 you heard her allegations of sexual harassment?  
3 **A. I -- initially I was not interested in the**  
4 **tapes because at some point in time when I learned**  
5 **about them, I -- based on lack of any other**  
6 **information, I didn't know whether they would be**  
7 **relevant.**  
8 Q. So initially you weren't interested in the  
9 tapes because you weren't sure whether they'd be  
10 relevant. Is that accurate?  
11 **A. Yes.**  
12 Q. Well, is it fair to say in doing an  
13 investigation the best way to determine whether these  
14 tapes would be relevant is to listen to them?  
15 **A. Yes, if I thought that they -- I had a concern**  
16 **that any tape I would listen to would be -- could be**  
17 **doctored.**  
18 Q. Doctored by Ms. Snyder?  
19 **A. I didn't name anyone. I just -- I have no way**  
20 **to prove -- it's very difficult to prove who or what**  
21 **is on an audiotape, ma'am.**  
22 Q. But is it fair to say that listening to the  
23 tape would help you determine at least whether or not  
24 the information on the tape is relevant?

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1 **A. I would just say that I'm not a sound expert**  
2 **and tapes can be -- any tape can be -- I just had a**  
3 **concern at that time initially.**  
4 Q. Well, could you have presented the tape to  
5 Mr. Harris and asked him if that was his voice on the  
6 tape?  
7 MS. DIBIANCA: I'm just going to object to  
8 the extent it calls for speculation.  
9 You can go ahead and answer.  
10 **A. My answer is that's a possibility.**  
11 Q. But you chose not to do that?  
12 **A. Not initially, ma'am.**  
13 Q. Did you tell Terry when she offered to provide  
14 you with the tapes that you wanted to hold off on  
15 reaching those channels yet?  
16 **A. I don't recall saying that.**  
17 Q. But is it, in fact, true that you wanted to  
18 hold off on reaching those channels yet?  
19 **A. I wouldn't say it was holding off.**  
20 Q. We're still on the April 8th meeting. Did she  
21 tell you during that meeting that she did not want to  
22 lose her job?  
23 **A. I don't know that, but it seemed to me that**  
24 **Miss Snyder wanted to continue her employment with**

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1 CitiSteel.  
2 Q. Continue her employment with CitiSteel in the  
3 melt shop or continue her employment, period?  
4 **A. Continue her employment in the melt shop.**  
5 Q. Did she tell you in that meeting on April 8th  
6 that she didn't want Randolph Harris fired, she just  
7 wanted the sexual harassment to stop?  
8 **A. My answer is that Miss Snyder said so many**  
9 **things in such a short span of time, it was hard to**  
10 **discern exactly what she wanted. I wasn't sure.**  
11 Q. Did you ask her what she wanted?  
12 **A. Not -- not at -- in that meeting, no.**  
13 Q. But did you ask her at some point what she  
14 wanted?  
15 **A. Yes.**  
16 Q. What was her response?  
17 **A. At some future time, as I best recall, she**  
18 **wanted Randolph Harris to be punished and to be**  
19 **transferred from his job.**  
20 Q. Do you know whether or not that was after you  
21 gave her the option to either transfer to shipping or  
22 resign?  
23 **A. That came before that. Miss Snyder was --**  
24 **appeared to be, without being ad hominem, appeared to**

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1 **be angry about Mr. Harris.**  
2 Q. Do you think that was a reasonable reaction to  
3 her experience of sexual harassment?  
4 MS. DIBIANCA: Well, I'm going to object as  
5 to the form.  
6 You can go ahead and answer, Jerry. Sorry.  
7 **A. I have no basis to make an evaluation on that**  
8 **because I found no evidence of sexual harassment.**  
9 Q. So I'm not sure I understand your answer.  
10 I guess my question is: Is anger a  
11 reasonable reaction to sexual harassment?  
12 **A. In the broad sense, absolutely.**  
13 Q. Okay.  
14 **A. If it, indeed, occurs.**  
15 Q. Did she tell you during this meeting, and by  
16 "this meeting" I mean April 8th, that she would feel  
17 comfortable going back to the melt shop and working  
18 around Harris?  
19 **A. Ma'am, I don't recall that, but I got the**  
20 **impression she would have been.**  
21 Q. How did you get that impression?  
22 **A. Because she wanted to go back to her job. She**  
23 **wanted to go back to work after she made this**  
24 **allegation, ma'am.**

7 (Pages 22 to 25)

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1 Q. Did you tell Terry Snyder at any time that  
2 Randolph Harris better confess or admit that he  
3 sexually harassed her?  
4 **A. Would you restate that question?**  
5 Q. Yes. Sure. Certainly.  
6 Did you tell Terry Snyder at any time  
7 during any of your meetings with her concerning the  
8 sexual harassment allegations that Randolph Harris  
9 should admit it or better confess to this?  
10 **A. No.**  
11 Q. Now, Terry, you met with her on April 8th. I  
12 think that's been established.  
13 Do you recall when the first time or when  
14 you initially met with Randolph Harris?  
15 **A. No.**  
16 Q. Can I refer you back to the exhibit? It's  
17 labeled D375, D376, and I believe D377. It's the same  
18 time of Greg Buragino and we've marked it as Downie 2,  
19 I believe. Do you have that in front of you?  
20 **A. Yes.**  
21 Q. Go ahead and turn to the next page. I'm going  
22 to just start reading. It's close to the top and it  
23 says: "Jerry and I returned to the room and Terry had  
24 completed 2 pages of summary. She was allowed to make

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1 a copy for herself.  
2 "We expressed to her that this would be  
3 given a high priority for investigation and that we  
4 took this matter very seriously. She was then allowed  
5 to leave."  
6 And then the next line is: "Jerry  
7 contacted Randolph via cell phone. Randolph was at  
8 jury duty this day and Randolph agreed to come into  
9 the plant for a meeting at approximately 3:45."  
10 Then it says: "Jerry and I met with  
11 Randolph and discussed the claims that Terry had  
12 made."  
13 Now, I've read you the statement of  
14 Mr. Buragino. Do you have any reason to dispute that  
15 you met with Mr. Randolph Harris soon after you met  
16 with Terry Snyder?  
17 **A. No.**  
18 Q. Does that help refresh your recollection in any  
19 way regarding your second meeting?  
20 **A. My answer is I held a lot of meetings**  
21 **between -- I did the investigation between April 8th**  
22 **and April 10th based on, you know, what -- you can**  
23 **refresh my recollection with these documents. The**  
24 **exact times of when this occurred, I don't remember.**

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1 Q. But you did meet with Randolph Harris at some  
2 time?  
3 **A. I did meet with Mr. Harris, yes, ma'am.**  
4 Q. Was Mr. Buragino involved in that meeting, as  
5 well?  
6 **A. I don't remember.**  
7 Q. Tell me what happened or what you can recall  
8 about what happened in the meeting with Randolph  
9 Harris.  
10 **A. Randolph was asked by me directly whether he**  
11 **was involved in any type of sexual harassment, verbal**  
12 **or otherwise, with Ms. Snyder. He emphatically denied**  
13 **it.**  
14 Q. Then what did you tell him?  
15 **A. I don't remember.**  
16 Q. After you met with Randolph Harris, was your  
17 investigation complete at that point?  
18 **A. No.**  
19 Q. What was the next step?  
20 **A. I don't remember.**  
21 Q. But you know it wasn't complete?  
22 **A. Right.**  
23 Q. How do you know it wasn't complete?  
24 **A. I believe I talked to Dennis Ford. I believe I**

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1 **talked with Greg Buragino. I believe I talked to Jim**  
2 **Ryan. I believe I talked to my boss.**  
3 Q. Who is your boss?  
4 **A. His name was Warren Bieger.**  
5 Q. Warren Bieger. At some point did you have a  
6 meeting with Warren Bieger?  
7 **A. Yes.**  
8 Q. Couldn't have been the next day, April 9th,  
9 2003?  
10 **A. I don't remember when.**  
11 Q. I'd like you to take a look at what's been  
12 Bates stamped D382 and D383.  
13 MS. BREWINGTON: We are going to have that  
14 marked as Downie 3.  
15 (Downie Exhibit 3 was marked for  
16 identification.)  
17 BY MS. BREWINGTON:  
18 Q. This document is a memo. It's dated April 9th,  
19 2003, and it's from you and the subject of it is  
20 "Meeting regarding Terry Snyder allegations."  
21 Do you see that it says that?  
22 **A. Yes.**  
23 Q. The first sentence says: "Today I met with the  
24 management team from 9:15 to about 9:45 to discuss the

8 (Pages 26 to 29)

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1 subject."  
2 Who's involved in the management team?  
3 **A. People in the management team in the**  
4 **corporation at that time would have been Mr. Buragino,**  
5 **people like him and me and the president.**  
6 Q. So Mr. Buragino, Jerry Downie, and Mr. Bieger,  
7 Warren Bieger. Is that accurate?  
8 **A. As I can recall, because they're on the**  
9 **management team.**  
10 Q. Now, do you recall what was discussed in this  
11 meeting?  
12 **A. Well, other than just reading this, this**  
13 **summarizes -- I really don't remember. I mean,**  
14 **probably the major thrust of this was that there was**  
15 **an allegation made and each of the two parties**  
16 **involved had different stories. There were no**  
17 **witnesses. And each of the parties held fast to their**  
18 **views. So some type of decision had to be made.**  
19 Q. Okay.  
20 **A. That's what I recall.**  
21 Q. Do you know whether your investigation was  
22 complete after meeting with the management team?  
23 **A. I -- no, no, it was not complete.**  
24 Q. How do you know it wasn't complete yet?

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1 **A. One reason I know is because I decided that I**  
2 **would ask to see the tapes and diaries even though I**  
3 **was dubious.**  
4 Q. Why did you think it was dubious?  
5 MS. DIBIANCA: I'll object to the extent  
6 that you're mischaracterizing.  
7 MS. BREWINGTON: I don't mean to  
8 mischaracterize. I mean, that's what he said.  
9 MS. DIBIANCA: No. He said that he thought  
10 that he was dubious, not that the tapes were dubious.  
11 MS. BREWINGTON: Oh, okay.  
12 MS. DIBIANCA: A technicality.  
13 MS. BREWINGTON: Sorry. I didn't hear  
14 that.  
15 MS. DIBIANCA: Jerry. Go ahead and answer.  
16 Sorry about that.  
17 THE WITNESS: No. That's okay.  
18 **A. I've already stated what my concerns were about**  
19 **the tapes, and I decided that before any final**  
20 **decisions were made, I would ask to review those,**  
21 **which I eventually did.**  
22 **BY MS. BREWINGTON:**  
23 Q. When you say which you eventually did, you  
24 asked to see the tapes. Is that what you're saying?

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1 **A. Yes, ma'am.**  
2 Q. At this point, at the end of your meeting here,  
3 you decided that your investigation was not complete  
4 and that you would review the tapes. Is that  
5 accurate?  
6 **A. That's one of the issues of the meeting.**  
7 Q. Why was it decided that she be transferred to  
8 the shipping department as of this April 9th, 2003,  
9 meeting?  
10 **A. That was not decided in the meeting.**  
11 Q. It wasn't decided.  
12 **A. No.**  
13 Q. Let me take you to this --  
14 **A. It was -- I'm sorry. It was an option that was**  
15 **discussed.**  
16 Q. Let me take you to the second paragraph. It's  
17 the first sentence. It says: "Given there was no  
18 concrete proof of sexual harassment, it was decided  
19 that Terry be transferred to the shipping department."  
20 **A. Yes, ma'am, absent any other information.**  
21 Q. You just forgot to put that part in there?  
22 **A. I feel comfortable in saying that's true, but I**  
23 **think it's also true by anyone's account that in my --**  
24 **prior to my last meeting with Miss Snyder, I did ask**

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1 **her to bring information to the meeting. If I asked**  
2 **for more information in the meeting, that means that I**  
3 **still am not complete with my investigation and that I**  
4 **still reserved my judgment to do the best job I could.**  
5 Q. Well, did Terry tell you that she wanted her  
6 father to be involved in the meeting so that she could  
7 show you the tapes with someone on her side there?  
8 **A. I do not recall the linkage of her father being**  
9 **there and the reason was the tapes. I don't recall**  
10 **that linkage at all.**  
11 Q. Was it your opinion as of April 9th that  
12 Miss Snyder may or may not be telling the truth?  
13 **A. Of course. One never knows who is telling the**  
14 **truth in a broad sense. I had no evidence.**  
15 **If I may, I'll explain that the only**  
16 **evidence I had was first the allegations and I**  
17 **interviewed the parties involved, and I had knowledge**  
18 **of Mr. Randolph's history with the company, which was**  
19 **exemplary, and I had knowledge of Ms. Snyder's history**  
20 **with the company, which was -- which contained a lot**  
21 **of incidents that were confusing and which also**  
22 **involved poor job performance.**  
23 **So that's -- I had to look at this matter**  
24 **in the context of the background and performance and**

9 (Pages 30 to 33)

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1 **record of the parties involved.**  
2 Q. When you talk about Miss Snyder and her poor  
3 performance, are you talking about the write-up that  
4 she was given in March of 2003?  
5 **A. That's partially it.**  
6 Q. This write-up, you voluntarily retracted this  
7 write-up, did you not?  
8 **A. I -- the answer is I did.**  
9 Q. Okay.  
10 **A. It was not voluntarily. It was requested.**  
11 Q. But you agreed to retract the write-up; is that  
12 correct?  
13 **A. I would agree to that, yes.**  
14 Q. Okay.  
15 **A. The write-up.**  
16 Q. The write-up. Yes. That's what I mean.  
17 That's what I said, I thought.  
18 **A. I did not voluntarily agree to forget all of**  
19 **the incidents that Miss Snyder was involved in, a**  
20 **couple of which were two other allegations that there**  
21 **was no proof of happening.**  
22 Q. Were those two things mentioned in the  
23 write-up?  
24 **A. I don't remember.**

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1 Q. Were you involved in the write-up of Terry  
2 Snyder?  
3 **A. Yes.**  
4 Q. What was your involvement in that write-up?  
5 **A. Any -- okay. As was my habit, when someone**  
6 **needs a written warning, the management people**  
7 **involved can deal with HR, human resources, myself,**  
8 **and/or Mr. Ryan and/or both, and we wanted to make**  
9 **sure that the facts were clear and that this is**  
10 **appropriate and fair and consistent with what should**  
11 **be put on paper and how it's communicated so it's done**  
12 **in a fair and proper way with employees. That was the**  
13 **context of my involvement, as I recall.**  
14 Q. Were you actually present when Miss Snyder was  
15 administered the written warning?  
16 **A. No, I was not.**  
17 Q. Do you see where it says, it's the third  
18 paragraph down, and we're looking at your memo of  
19 April 9th, 2003. It's the sentence that begins with  
20 "She." It's four lines from the bottom of the  
21 paragraph and it's paragraph three. Do you see where  
22 it says: "She wanted me to meet with her father at  
23 1 p.m. and I declined"?  
24 **A. Yes.**

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1 Q. Now, is that in reference to the fact that she  
2 asked for her father to be in the meeting but you  
3 declined?  
4 **A. Yes.**  
5 Q. Okay. From what we discussed earlier.  
6 Now, the beginning of that paragraph says:  
7 "Following that short meeting, Jim Ryan and I met with  
8 Terri at about 10:30 in the Plant Personnel office."  
9 So is it fair to say that you met with the  
10 management team in the morning and then met with Terry  
11 at around 10:30?  
12 **A. Yes.**  
13 Q. Do you recall anything that happened in that  
14 meeting?  
15 **A. From my recollection, it was a very emotional**  
16 **meeting from the standpoint that Terry was very upset.**  
17 **Initially I got the impression that Terry wanted the**  
18 **company to fire her.**  
19 Q. Why did you get that impression?  
20 **A. We were being provoked.**  
21 Q. Okay, but earlier you said she wanted her job  
22 and she liked her job and she wanted to go back to the  
23 melt shop.  
24 **A. Yes, ma'am, I did state that.**

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1 Q. Okay.  
2 MS. DiBIANCA: I don't know that he  
3 finished his answer.  
4 Jerry, you finished with the word  
5 "provoked" and was there something else after that?  
6 THE WITNESS: Yes, yes.  
7 **A. Ms. Snyder did not bring the tapes. Ms. Snyder**  
8 **was insulting to us and was loud and she had a tape**  
9 **recorder there and I asked her to please turn it off.**  
10 **She said she did. Apparently she had not.**  
11 **BY MS. BREWINGTON:**  
12 Q. Are you sure that that was the meeting on  
13 April 9th and not the meeting on April 10th?  
14 **A. Then I'm at the wrong meeting.**  
15 Q. Stay with me on the 9th and I'll let you speak  
16 about all that you can remember about the meeting on  
17 the 10th. I know it's difficult to remember that far  
18 back.  
19 On April 9th, 2003, did you discuss with  
20 Terry a decision to either transfer her to shipping or  
21 voluntarily resigning?  
22 **A. Ma'am, I have to say to you that I believe that**  
23 **it says "Following that short meeting" -- I am**  
24 **confused of the meeting in the plant personnel office.**

10 (Pages 34 to 37)



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1 **I just do not recall what happened there.**  
2 Q. So you don't recall whether or not you  
3 mentioned the transfer at that point?  
4 **A. I really don't and I apologize for that.**  
5 Q. That's fine.  
6 **A. I just don't recall.**  
7 Q. Is it fair to say you mentioned this transfer  
8 at some point?  
9 **A. If it says here I did, I must have, so I'll go**  
10 **with the record. I don't want to challenge the**  
11 **record.**  
12 Q. Do you not have any recollection of talking to  
13 her about transferring to shipping?  
14 **A. I must have. As I said, I'm embarrassed. As I**  
15 **said, the meeting that was on the 9th, I just don't**  
16 **recall really what was done at that meeting.**  
17 Q. Is it fair to say that you recall that she was  
18 upset in that meeting?  
19 **A. No, I don't recall that in this meeting, no.**  
20 Q. So you recall her being upset in the April 10th  
21 meeting?  
22 **A. Yes, ma'am.**  
23 MS. BREWINGTON: Is everybody okay? Do you  
24 want to take a break?

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1 MS. DiBIANCA: It's been an hour. I'm, of  
2 course, ready whenever you are.  
3 MS. BREWINGTON: Do you want to do ten  
4 minutes? Five minutes?  
5 MS. DiBIANCA: Five is fine with me.  
6 (A recess was taken at this time.)  
7 BY MS. BREWINGTON:  
8 Q. Question: I was looking at the first paragraph  
9 here in your memo. It's dated April 9th, 2003. It  
10 says: "Messrs. Ford, Buragino and I listened to the  
11 voice mail she left which sounded sexual in nature."  
12 Do you see where it says that?  
13 **A. Which one was this?**  
14 Q. We're looking at -- it's D382.  
15 **A. Yes.**  
16 Q. The first paragraph there.  
17 **A. Yes.**  
18 Q. It says: "Messrs. Ford, Buragino and I  
19 listened to the voice mail she left which sounded  
20 sexual in nature."  
21 **A. Yes.**  
22 Q. What do you recall about that?  
23 **A. I recall that we were told that someone was --**  
24 **that Miss Snyder, someone was calling her on the phone**

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1 **constantly. We investigated it.**  
2 Q. You were told by whom?  
3 **A. (No response.)**  
4 Q. Did you hear the question?  
5 **A. I heard the question.**  
6 Q. Oh, okay.  
7 **A. I -- I don't -- I don't remember how all this**  
8 **came up, but it seems to me, as I recall, that**  
9 **Miss Snyder alleged that she was getting some phone**  
10 **calls from someone. That's all I can remember.**  
11 Q. That she was getting phone calls for someone,  
12 not that she left a voice mail on someone's answering  
13 machine.  
14 **A. Yes, yes.**  
15 Q. "Yes" to what?  
16 **A. The first.**  
17 Q. So for clarification purposes, you recall  
18 something with respect to Miss Snyder telling someone  
19 that someone was calling her?  
20 **A. Yes.**  
21 Q. But not that she was leaving voice mails?  
22 **A. Yes.**  
23 Q. Did you investigate this?  
24 **A. Yes. We listened to this.**

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1 Q. You listened to what?  
2 **A. This message.**  
3 Q. It was a message on Terry's voice mail?  
4 **A. I think so. I don't remember whose voice mail**  
5 **it was on.**  
6 Q. What did you learn after listening to the  
7 message?  
8 **A. Nothing.**  
9 Q. Who was on the message?  
10 **A. I don't know.**  
11 Q. Was it a female or male?  
12 **A. I don't recall.**  
13 Q. Did you question Terry about the voice mail?  
14 **A. I did not.**  
15 Q. Did anyone question Terry?  
16 **A. Her management.**  
17 Q. Who is --  
18 **A. Her managers. I think, as I recall, it was**  
19 **Mr. Buragino and -- excuse me. Maybe -- I'm not sure**  
20 **who did. It was either Dennis or Randolph or Greg**  
21 **Buragino.**  
22 Q. Was she written up for this?  
23 **A. No.**  
24 Q. Now I'd like to take you to the fourth

11 (Pages 38 to 41)

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1 paragraph down. It's the last paragraph on the first  
2 page. It's the second sentence and it says: "I  
3 noticed that Terri was whispering to an employee in  
4 the finance department and asked her to come to my  
5 office which she did do where Jim and I met with her  
6 again."  
7 My question is: Was she whispering to  
8 Carmella Patrone?  
9 **A. I don't remember.**  
10 Q. Do you know who Carmella Patrone is?  
11 **A. Oh, sure.**  
12 Q. Is she in the finance department?  
13 **A. Yes.**  
14 Q. Could she have been whispering to Carmella  
15 Patrone?  
16 **A. Yes.**  
17 Q. Were you concerned that she was talking to  
18 another employee?  
19 **A. I was concerned that there wouldn't be any more**  
20 **business disruption.**  
21 Q. I don't understand. You were concerned --  
22 **A. We -- when we started this investigation, all**  
23 **the parties were told to please keep this**  
24 **confidential, as is our practice, and we just felt**

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1 **that we -- I still do feel it's appropriate that when**  
2 **there's an EEO problem or sexual harassment charge or**  
3 **whatever, that all the parties involved should keep**  
4 **the matter confidential. We all agreed to that.**  
5 Q. Did you hear her say anything to Carmella  
6 Patrone?  
7 **A. I don't remember.**  
8 Q. But that's not noted in your statement, is it?  
9 **A. I don't see it.**  
10 Q. Did you ask Terry to take the rest of the day  
11 off that day?  
12 **A. I don't remember.**  
13 Q. Excuse me?  
14 **A. I don't remember, ma'am.**  
15 Q. Turn to the second page for me, please, if you  
16 would. It's part of the last sentence on the first  
17 page and it says: "Given the events during these two  
18 meetings, I asked her to take the rest of the day off  
19 with pay to diffuse the situation."  
20 Is that accurate?  
21 **A. If I -- if I wrote it down, it would be**  
22 **accurate, yes.**  
23 Q. Do you know whether Randolph Harris worked that  
24 day?

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1 **A. I don't know.**  
2 Q. Is there a reason why you would send Terry  
3 Snyder home and leave Randolph Harris working?  
4 **A. Miss Harris was very, very upset.**  
5 Q. Miss Snyder?  
6 **A. Excuse me.**  
7 **Miss Snyder was very, very upset and I**  
8 **don't recall the context of what happened, really, but**  
9 **if -- not "if," but when I did this, I must have done**  
10 **it because I felt that it would be best for her, we**  
11 **would pay her for the time and she just, you know,**  
12 **could take it easy just to try to diffuse, if that is**  
13 **the word, the situation.**  
14 Q. Do you know whether she was upset because she  
15 was given the option to transfer or resign?  
16 MS. DIBIANCA: I'm sorry. Could you repeat  
17 the question?  
18 **A. Yeah. Would you repeat that question?**  
19 Q. I guess my question is: Do you know whether  
20 the reason for why she was upset, and I asked do you  
21 know whether she was upset because she was asked to  
22 resign or transfer to shipping?  
23 **A. I don't recall her asking that.**  
24 Q. Okay.

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1 **A. That kind of question to me is -- I --**  
2 Q. You don't recall asking her why she was upset?  
3 Is that what you're saying?  
4 **A. No.**  
5 Q. Okay.  
6 **A. The question you just asked me begged several**  
7 **other questions, and it's difficult for me to answer,**  
8 **but I don't -- go ahead.**  
9 Q. Were you finished?  
10 **A. Yes.**  
11 Q. Did you and Jim Ryan follow Miss Snyder to the  
12 finance department?  
13 **A. I don't recall that. I don't remember that.**  
14 Q. Did you have business in the finance department  
15 that day?  
16 **A. It's a small building. I walk around. All of**  
17 **us walk around the building, so I don't recall.**  
18 Q. So Terry was sent home that day.  
19 Was she given any instructions at the end  
20 of that second meeting?  
21 **A. I really don't remember much about that**  
22 **meeting. All I can say is, as would be my habit, if**  
23 **someone -- if I would suggest, and I've done it**  
24 **before, that someone just go who home they're too**

12 (Pages 42 to 45)

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1 **upset or to diffuse the situation, I would have**  
2 **probably said, look, I'll be in contact with you.**  
3 **That's all I can say.**  
4 Q. So you don't know whether you told her to  
5 report to human resource the next day?  
6 **A. I don't remember, ma'am.**  
7 Q. When did this option to transfer Miss Snyder to  
8 shipping come about?  
9 **A. As an idea or as a discussion, question?**  
10 Q. You're asking me?  
11 **A. Yes, ma'am.**  
12 Q. When did it come about as an idea or when did  
13 it come about as a discussion?  
14 **A. Yes, ma'am.**  
15 Q. I guess I'm asking you both. We can go with:  
16 When did the idea come about first?  
17 **A. Well, the idea came about, we had two employees**  
18 **who had different stories. We have an allegation and**  
19 **we believe that separation of the two individuals was**  
20 **the best, absent any other further information that**  
21 **may have been gleaned that last day I saw her. If**  
22 **there's nothing else to come up with any further**  
23 **investigation, discussions, whatever, we felt that the**  
24 **best thing to do would be to have separation. And so**

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1 **the melt shop, but I really don't remember.**  
2 Q. So there was already a clerk-typist in the  
3 shipping department, so she would have been the second  
4 one?  
5 **A. There might have been two at that time. I just**  
6 **don't remember.**  
7 Q. Terry's position, was she going to be laid off  
8 from her position?  
9 **A. Laid off?**  
10 Q. Yes.  
11 **A. That was never discussed.**  
12 Q. It was never discussed with anyone?  
13 **A. Not that I know of. We never used the word --**  
14 **that didn't come up.**  
15 Q. It didn't come up that the clerk-typist job was  
16 going to be eliminated in the melt shop?  
17 **A. That's a different -- ma'am, I beg to say that**  
18 **that's different. Elimination of a position and**  
19 **laying someone off are two different questions.**  
20 Q. Okay. Okay. That's fair.  
21 **A. So it was organizationally not discussed**  
22 **openly, but behind the scenes it was discussed that**  
23 **the -- there could be a reorganization. One of the**  
24 **reasons was is that a hope that some work, a lot more**

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1 **it came up in our discussions about, you know, what to**  
2 **do about the situation.**  
3 Q. What discussions?  
4 **A. This was a discussion with the management**  
5 **committee members, me and Greg and the boss,**  
6 **Mr. Bieger. And when it was first discussed, I don't**  
7 **remember, with Terry, with Ms. Snyder. I don't**  
8 **recall.**  
9 Q. Was there a position open in the shipping  
10 department?  
11 **A. Technically, no, but we were going to be**  
12 **increasing a person over there because of workload.**  
13 Q. How many people are in the shipping department?  
14 **A. I have no idea. I can't remember.**  
15 Q. Are there more people in the melt shop than the  
16 shipping department?  
17 MS. DIBIANCA: I object because you said  
18 "are there" versus was there.  
19 MS. BREWINGTON: I'm sorry. Yes.  
20 BY MS. BREWINGTON:  
21 Q. Was there? I'm talking about specifically the  
22 time when Terry was employed.  
23 **A. You know, that's a good question because we**  
24 **increased the shipping. I think slightly more than**

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1 **work could be -- what do you call that when you use**  
2 **computers? You know, you engineer out so we didn't**  
3 **have to have ways to do it. So that's how all that**  
4 **came about.**  
5 Q. When did that conversation come about regarding  
6 the reorganization?  
7 **A. It came about in the meeting with my boss. He**  
8 **said that this is something he was thinking about. I**  
9 **think we documented that somewhere in this. I can't**  
10 **remember where.**  
11 Q. So you're saying in that management meeting?  
12 **A. I believe it was there, yes.**  
13 Q. So prior to that time, the notion of  
14 eliminating the clerk-typist job in the melt shop had  
15 not been discussed?  
16 **A. With me I think. I think it had been discussed**  
17 **with other management people, but not with me.**  
18 Q. It hadn't been discussed with you?  
19 **A. That's right.**  
20 Q. Who had it been discussed with?  
21 **A. I have no idea.**  
22 Q. So you don't know whether or not it had been  
23 discussed?  
24 **A. I was told it had been.**

13 (Pages 46 to 49)

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1 Q. Who were you told it had been discussed by?  
2 **A. My boss.**  
3 Q. Warren Bieger told you he had previously  
4 discussed it with someone?  
5 **A. Yes. Thinking about it, yes.**  
6 Q. You don't know the name of the person?  
7 **A. No.**  
8 Q. Greg Buragino, what was his position?  
9 **A. He was the vice president of operations.**  
10 Q. In the melt shop?  
11 **A. In the melt shop.**  
12 Q. In the melt shop; is that right? Or just  
13 vice president of operations, total?  
14 **A. I believe -- it's been a couple years ago. I**  
15 **believe he was vice president of operations for the**  
16 **entire company, but maybe I'm wrong, but I think so.**  
17 **Either that or he was just in the melt shop. I cannot**  
18 **remember.**  
19 Q. Well, would it surprise you that we took his  
20 deposition previously and he testified that he was not  
21 aware until this management meeting that the  
22 clerk-typist job was going to be eliminated in the  
23 melt shop?  
24 **A. No, it wouldn't surprise me because maybe**

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1 **Mr. Bieger discussed it with some other people and**  
2 **there's other people.**  
3 Q. Okay.  
4 **A. No, that wouldn't surprise me. He sounded**  
5 **surprised -- he looked surprised when it was brought**  
6 **up.**  
7 Q. "He," Mr. Buragino?  
8 **A. Yes.**  
9 Q. You recall that?  
10 **A. I think -- I think in the context of that**  
11 **meeting this was new information to us.**  
12 Q. Okay.  
13 **A. But I -- you know, maybe he -- maybe**  
14 **Mr. Buragino discussed with Greg -- I know he**  
15 **discussed with Greg the fact that he wanted to**  
16 **automate -- there's the word -- automate some more**  
17 **work. So that was not a new issue.**  
18 **So if we can separate the issue of**  
19 **automation, the clerk-typist issue, I think they are**  
20 **two different issues.**  
21 Q. Take a look at a document that was sent to you.  
22 It starts with D-220 and it's a fairly thick document  
23 through D241.  
24 MS. BREWINGTON: We are going to mark this

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1 as Downie 4.  
2 (Downie Exhibit 4 was marked for  
3 identification.)  
4 BY MS. BREWINGTON:  
5 Q. It's entitled "CitiSteel USA Incorporated,  
6 Sexual Harassment Investigation Checklist."  
7 I'd like you to flip to page 13 of this  
8 document. Is that your signature there?  
9 **A. Is that D-232?**  
10 Q. D220. Oh, yes, you're right. Page 13 is D232.  
11 **A. That's my signature.**  
12 Q. The date is 4/8 and 4/9 of 2003?  
13 **A. Mm-hmm.**  
14 Q. Turn to page 19. It's D238. Is that also your  
15 signature there? It's dated 4/8/03.  
16 **A. Yes.**  
17 Q. Now, tell me what this document represents.  
18 **A. This is merely a guide that I used in the**  
19 **situation to assist me to -- in my investigation.**  
20 Q. On the first page there's two initials  
21 together. Do you see where it says that?  
22 **A. Mm-hmm.**  
23 Q. "JD" and "GB"? Is that accurate?  
24 **A. Yes.**

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1 Q. Whose initials are JD?  
2 **A. Me.**  
3 Q. Jerry Downie. And GB?  
4 **A. That would be Greg Buragino.**  
5 Q. Then next to it, I think there's a slash and  
6 then it says "JD & JWR."  
7 **A. Yes.**  
8 Q. Is JD you again?  
9 **A. Yes.**  
10 Q. And JWR is --  
11 **A. Jim Ryan.**  
12 Q. Let me take you to the next page. It's labeled  
13 D221. Do you see where it says "Alleged harasser"?  
14 **A. Yes.**  
15 Q. "RH"?  
16 **A. Yes.**  
17 Q. Who is that?  
18 **A. Randolph Harris.**  
19 Q. "Complainant's supervisor: GB"?  
20 **A. Greg Buragino.**  
21 Q. "Alleged harasser's supervisor"?  
22 **A. Is there a question?**  
23 Q. Yes. Those signatures, RH, DF stand for --  
24 **A. Yeah. Randolph Harris and Dennis Ford.**

14 (Pages 50 to 53)